

EXHIBIT 1

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
Case No. 15-cv-0023 (CBA) (VMS)

DR. JOSEPH WILSON, PhD,
Plaintiff.

- against -

THE STATE OF NEW YORK, et al.,

Defendants.

January 29, 2019

9:30 a.m.

DEPOSITION of DR. JOSEPH WILSON,
taken by the Defendants, pursuant to
Notice, held at the Law Offices of John S.
Yong, P.C., 39 East Broadway, New York,
New York, before Debbie Zaromatidis, a
Shorthand Reporter and Notary Public of
the State of New York.

1 2 APPEARANCES : 3 4 LAW OFFICE OF JOHN S. YONG, P.C. 5 Attorneys for Plaintiff 6 39 East Broadway 7 New York, New York 8 BY: CHRIS YONG, ESQ. 9 - and - 10 JAMES B. KLEIN, ESQ. 11 12 STATE OF NEW YORK 13 OFFICE OF THE ATTORNEY GENERAL 14 Attorneys for Defendants 15 28 Liberty Street 16 New York, New York 17 BY: MARK E. KLEIN, ESQ. 18 19 20 21 22 23 24 25	Page 2	Page 4
1 2 STIPULATIONS 3 4 IT IS HEREBY STIPULATED AND 5 AGREED by and between the Attorneys for 6 the respective parties hereto that filing 7 and sealing be and the same are hereby 8 waived. 9 IT IS FURTHER STIPULATED AND 10 AGREED that all objections except as to 11 the form of the question, shall be 12 reserved to the time of the trial. 13 IT IS FURTHER STIPULATED AND 14 AGREED that the within examination may be 15 signed and sworn to before any notary 16 public with the same force and effect as 17 though signed and sworn to before this 18 Court. 19 20 21 22 23 24 25	Page 3	1 WILSON 2 DR. JOSEPH WILSON, 3 having first been duly sworn by a Notary 4 Public of the State of New York, was 5 examined and testified as follows: 6 EXAMINATION BY MR. KLEIN: 7 Q. Good morning, Dr. Wilson. 8 A. Good morning. 9 Q. Have you ever been deposed 10 before, sir? 11 A. No. 12 Q. You understand, sir, that I'll 13 be asking you a series of questions today, 14 and you are required to answer those 15 questions under oath. Do you understand 16 that? 17 A. Yes, I do. 18 Q. And do you understand that the 19 oath you gave today is the same as if you 20 were testifying in court? Do you 21 understand that? 22 A. I understand that. 23 Q. If at any time you do not 24 understand the question that I ask you, 25 please tell me, and I'll do my best to

<p>1 WILSON 2 A. Clear my throat. 3 Q. -- and possibly taking a break, 4 does the fact that you are recovering from 5 a cold interfere with your ability to give 6 truthful and complete answer? 7 A. No. 8 Q. It is important that you allow 9 me to finish my question before you start 10 answering. The court reporter can't take 11 down both of us at the same time. Okay. 12 MR. JAMES KLEIN: Can I just 13 interject something? Last night we 14 received the Supplemental Disclosure under 15 Federal Rule 26 A where you disclosed to 16 us for the first time Ms. Joan C. Waters 17 as a potential witness in this case. 18 MR. MARK KLEIN: Actually I 19 e-mailed it to you last week. 20 MR. JAMES KLEIN: I don't think 21 I received it subsequent to the 22 investigation of documents obtained by 23 CUNY's investigation. Since I had not 24 seen this until last night, you know, I am 25 going to have a standing objection with</p>	<p>Page 6</p> <p>1 WILSON 2 A. I don't understand the question. 3 Q. Well, do you have a resume in 4 your possession either at home or here? 5 A. Not here, but I do have a resume 6 at home. 7 Q. And you reviewed that in 8 preparation for your deposition here 9 today? 10 A. Yes. 11 MR. MARK KLEIN: I call for 12 production of Dr. Wilson's resume that he 13 reviewed. 14 Q. Besides reviewing your resume, 15 did you do anything else in preparation 16 for your deposition? 17 A. I reviewed my books. 18 Q. What books are you referring to? 19 A. That would include Tearing Down 20 the Color Bar, A Documentary History and 21 Analysis of the Brotherhood of Sleeping 22 Car Porters. That would include Black 23 Labor in America. That would include Race 24 and Labor Matters the New Political 25 Economy. That would include -- because</p>
<p>1 WILSON 2 regards to anything that is the subject 3 matter of Ms. Waters' potential testimony 4 because I do not believe that we had any 5 opportunity to do any discovery, and we 6 just got this last night. 7 MR. MARK KLEIN: Well, your 8 objection is completely off base, but I 9 hear what you say. 10 Q. All right. Dr. Wilson, what, 11 if anything, did you do in preparing for 12 your deposition here today? 13 MR. JAMES KLEIN: I would 14 object as to any privileged issues. 15 Q. Can you answer the question, 16 sir? 17 A. I reviewed my history of 18 employment at CUNY. 19 Q. And how did you go about 20 reviewing the history of your employment 21 at CUNY? 22 A. By carefully reviewing my 23 resume. 24 Q. And what resume are you 25 referring to?</p>	<p>Page 7</p> <p>1 WILSON 2 the actual encyclopedia was taken from me, 3 but the -- my Encyclopedia of Revolution 4 and Protest. 5 Q. When you said the actual 6 encyclopedia was taken from you, what 7 encyclopedia are you referring to? 8 A. The Encyclopedia of Protest and 9 Revolution. It is an eight-volume 10 publication. 11 Q. So you reviewed the Encyclopedia 12 of Protest and Revolution for preparation 13 of your testimony; is that right? 14 A. I went on Amazon and just looked 15 at the Amazon listing. 16 Q. Okay. Besides what you've 17 described, did you do anything else in 18 preparation for your deposition here 19 today? 20 MR. JAMES KLEIN: I am just 21 going to have a standing objection to 22 anything that refers to anything involving 23 privilege. 24 MR. MARK KLEIN: I am entitled 25 to know whether he met with counsel.</p>

1 WILSON 2 MR. JAMES KLEIN: He met with 3 counsel. I am saying -- 4 MR. MARK KLEIN: You don't need 5 to repeat it. I want to know what he did 6 in preparation for his deposition. 7 A. I met with counsel. 8 Q. Who did you meet with? 9 A. I met with John Yong. 10 Q. Anybody else? 11 A. I met with Chris Yong. 12 Q. Anybody else? 13 A. I met with James Klein. 14 Q. Anybody else? 15 A. I met with two other legal 16 associates of John Yong whose -- yes, two 17 other legal associates of John Yong. 18 Q. What are their names? 19 A. I am not -- I am not sure of 20 their names. 21 Q. Anybody else that you met with? 22 A. There may have been a paralegal 23 who sat in at one of those meetings. 24 Q. All right. Did you meet with 25 John Yong, Chris Yong, and James Klein all	Page 10	1 WILSON 2 for your deposition here today? 3 A. Just a few minutes ago James and 4 I had a very brief meeting. 5 Q. Before today when was your most 6 recent meeting with counsel in preparation 7 for your deposition? 8 A. Sunday. 9 Q. And where did you meet Sunday? 10 A. At my apartment. 11 Q. Where is your apartment? 12 A. 215 West 91st Street, Apartment 13 83. 14 Q. And that is in Manhattan? 15 A. Manhattan, New York City. 16 Q. And who did you meet with on 17 Sunday at your apartment? 18 A. James Klein. 19 Q. And how long did you meet with 20 Mr. Klein? 21 A. A couple of hours. 22 Q. Did you meet in the morning or 23 in the afternoon or in the evening? 24 A. Afternoon. 25 Q. And it is your testimony that in	Page 12
1 WILSON 2 together or separately? 3 A. I met with them separately and 4 in combinations. 5 Q. How many meetings did you have 6 with counsel in preparation for your 7 deposition today? 8 A. I would say a few. 9 Q. Can you be any more exact? 10 A. Can you repeat the question? 11 Q. Can you be any more specific as 12 to how many times you met with counsel in 13 preparation for your deposition here 14 today? 15 A. Do you mean with each one of 16 those people? 17 Q. Yes. How many meetings did you 18 have? 19 A. Approximately ten. 20 Q. You had approximately ten 21 meetings in preparation for your 22 deposition here today; is that right? 23 A. That's right. 24 Q. When was the most recent meeting 25 you had in preparation with your counsel	Page 11	1 WILSON 2 addition to meeting with Mr. Klein on 3 Sunday at your apartment you had 4 approximately another nine meetings with 5 counsel in preparation for your deposition 6 today; is that right? 7 A. That's correct. 8 Q. When was the first time you met 9 with any counsel to prepare for your 10 deposition? 11 A. I don't recall the first day. 12 Q. What is your best recollection 13 as to when you first met with counsel in 14 preparation for your deposition? 15 A. Maybe three weeks ago. 16 Q. So it was in the calendar year 17 2019; is that right? 18 A. Well, no, there were some 19 meetings in the calendar year of 2018, so 20 that perhaps would have been more than 21 three weeks ago. 22 Q. Well, were these meetings in the 23 calendar year 2018 in preparation for your 24 deposition? 25 A. Yes.	Page 13

<p>1 WILSON 2 Q. All together what is your best 3 approximation of how many hours you spent 4 with counsel preparing for your deposition 5 here today? 6 A. Maybe eight to ten hours. 7 MR. MARK KLEIN: I ask that the 8 reporter mark as Wilson Exhibit 1 a 9 document titled "Plaintiff's Initial 10 Disclosures." 11 (Wilson Exhibit 1 marked for 12 identification.) 13 (Document handed to witness.) 14 Q. Dr. Wilson, I show you what has 15 been marked as Wilson Exhibit 1. Please 16 take a moment to review the document and 17 tell me when you have done so. 18 (Document handed to witness.) 19 (Pause.) 20 Q. You don't have to read the whole 21 document now. I will point you to 22 specific parts I will ask you questions 23 about. 24 MR. JAMES KLEIN: You shouldn't 25 feel rushed. You should take whatever</p>	<p>Page 14</p> <p>1 WILSON 2 incidents and so forth and the various 3 people. 4 Q. So you sat with counsel and 5 orally provided information to counsel; is 6 that right? 7 A. That's correct. 8 Q. And counsel then prepared a 9 draft of the document; is that right? 10 MR. JAMES KLEIN: Well, I think 11 that is privileged what counsel did. 12 Q. Did you see a draft of the 13 document before it was served? 14 A. Yes, I did. 15 Q. So the document is dated June 29 16 of 2018. You saw a draft before it went 17 out; is that right? 18 A. Yes, I did. 19 Q. How far in advance of June 29, 20 2018 did you see a draft? 21 A. I don't recall. 22 Q. To your knowledge, is there 23 anything in this document that is not 24 accurate? 25 A. Not to my knowledge.</p>
<p>1 WILSON 2 time you need to review the document. 3 Q. Have you reviewed it, Dr. 4 Wilson? 5 A. Partially. 6 Q. Have you seen this document 7 before today? 8 A. Yes. 9 Q. Did you have any role in its 10 preparation? 11 A. Yes. 12 Q. What role did you have? 13 A. This information was 14 provided -- I provided much of the 15 information. 16 Q. How did you go about providing 17 information? Did you type it and send it 18 to counsel? 19 A. No. 20 MR. JAMES KLEIN: Again, any 21 privilege issue I object. 22 MR. MARK KLEIN: It is not 23 privileged how he provided information. 24 A. Through sitting with counsel and 25 attempting to remember the various</p>	<p>Page 15</p> <p>1 WILSON 2 Q. Okay. I would like to direct 3 your attention to the bottom of page 2 of 4 the document. You identify Natalie 5 Miller as an individual likely to have 6 knowledge of discoverable facts, correct? 7 A. Correct. 8 Q. When was the last time you 9 communicated with Natalie Miller? 10 A. Sometime -- I don't remember the 11 exact date. 12 Q. What is your best recollection 13 of the last time you spoke with her? 14 A. Maybe within the last couple of 15 weeks. 16 Q. For what purpose did you speak 17 with her within the last couple of week? 18 A. To see how she was doing. 19 Q. Was that the only purpose? 20 A. That was the only purpose. 21 Q. You didn't communicate with her 22 regarding preparation for your deposition? 23 A. No. 24 Q. Now, you identify as the subject 25 matter of her knowledge "Search and</p>

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<p>1 WILSON</p> <p>2 seizure, witnessed seizure and destruction</p> <p>3 and removal of plaintiff's property and</p> <p>4 loss of mail delivery."</p> <p>5 Do you see that?</p> <p>6 A. I see that.</p> <p>7 Q. What seizure and destruction and</p> <p>8 removal of plaintiff's property are you</p> <p>9 referring to?</p> <p>10 A. Ms. Miller was present when the</p> <p>11 raid occurred in the -- when the raid</p> <p>12 occurred, the initial raid.</p> <p>13 Q. And what raid are you referring</p> <p>14 to?</p> <p>15 A. That was the raid conducted by</p> <p>16 Ms. Isaacson and her staff at 25 Broadway.</p> <p>17 Q. Is it your testimony that</p> <p>18 Ms. Miller was present when Ms. Isaacson</p> <p>19 and others were there at your office?</p> <p>20 A. That's my testimony.</p> <p>21 Q. And how do you know that</p> <p>22 Ms. Miller was present when Ms. Isaacson</p> <p>23 and others came to your office at 25</p> <p>24 Broadway?</p> <p>25 A. I witnessed it.</p>	<p>Page 18</p> <p>1 WILSON</p> <p>2 the others didn't identify themselves, and</p> <p>3 there was one other individual who I</p> <p>4 forget. He may have identified himself.</p> <p>5 Q. How many people besides</p> <p>6 Ms. Isaacson were there?</p> <p>7 A. Maybe approximately eight</p> <p>8 people.</p> <p>9 Q. And don't you know the names of</p> <p>10 any of these approximately eight people</p> <p>11 besides Ms. Isaacson; is that right?</p> <p>12 A. Clarification. When you say</p> <p>13 you were there, what do you mean? With</p> <p>14 Ms. Isaacson.</p> <p>15 Q. With Ms. Isaacson, yes.</p> <p>16 A. Yes. Right. And I don't know</p> <p>17 the names of the others.</p> <p>18 Q. And you entered the premises</p> <p>19 while the "Raid" was in progress you</p> <p>20 testified?</p> <p>21 A. Correct.</p> <p>22 Q. And Ms. Miller was already</p> <p>23 there?</p> <p>24 A. Yes.</p> <p>25 Q. And was anybody else there who</p>	
<p>1 WILSON</p> <p>2 Q. You were there as well?</p> <p>3 A. Correct.</p> <p>4 Q. Do you know the date of the</p> <p>5 "Raid" that you are referring to?</p> <p>6 A. That would have been the end of</p> <p>7 January 2012 approximately, the last week.</p> <p>8 Q. And you were in your office when</p> <p>9 Ms. Isaacson and others came to conduct</p> <p>10 the "Raid" to use your word?</p> <p>11 A. No.</p> <p>12 Q. How is it that you witnessed it</p> <p>13 if you weren't in your office?</p> <p>14 A. Because I entered the premises</p> <p>15 while the raid was in progress.</p> <p>16 Q. What time of day was this?</p> <p>17 A. It would have been afternoon,</p> <p>18 late afternoon I believe.</p> <p>19 Q. And you've testified that</p> <p>20 Ms. Isaacson was present at the time of</p> <p>21 this "Raid"?</p> <p>22 A. Correct.</p> <p>23 Q. Who else was present besides</p> <p>24 Ms. Isaacson?</p> <p>25 A. There were other parties, and</p>	<p>Page 19</p> <p>1 WILSON</p> <p>2 worked at the Graduate Center For Worker</p> <p>3 Education?</p> <p>4 A. Yes.</p> <p>5 Q. Who?</p> <p>6 A. Annie London, Immanuel Ness.</p> <p>7 There were I believe some students there.</p> <p>8 Q. Were students in your office?</p> <p>9 A. No.</p> <p>10 Q. Was Ms. London in your office?</p> <p>11 A. No.</p> <p>12 Q. Was Professor Ness in your</p> <p>13 office?</p> <p>14 A. No.</p> <p>15 Q. Was Ms. Miller in your office?</p> <p>16 A. No.</p> <p>17 Q. Was there anyone else in your</p> <p>18 office besides you and Ms. Isaacson and</p> <p>19 the others with her?</p> <p>20 A. I didn't say I was in the</p> <p>21 office.</p> <p>22 MR. JAMES KLEIN: That is a</p> <p>23 mischaracterization.</p> <p>24 Q. Were you in your office at the</p> <p>25 time?</p>	<p>Page 21</p>

1 WILSON 2 A. No. 3 Q. What, if anything, did you say 4 to Ms. Isaacson when you entered the 5 premises? 6 A. I believe I said what are you 7 doing here. 8 Q. And what, if anything, did 9 Ms. Isaacson respond? 10 A. I don't recall her response. 11 Q. Do you recall any discussion 12 that you had with any of the -- either 13 with Ms. Isaacson or any of the people who 14 accompanied her? 15 A. Yes. 16 Q. What do you recall? 17 A. I recall Ms. Isaacson leaving 18 with some of my files, and the only file 19 that I could see that was obvious was 20 lecture notes. 21 Q. And what lecture notes? 22 A. That would have been lecture 23 notes for a class that I would have been 24 presenting, and that probably would have 25 been, you know, a pending class or an	Page 22	1 WILSON 2 were staff and students from City College. 3 They have a large staff, so they were in 4 the area in the vicinity while this was 5 happening. 6 Q. And I just want to be sure 7 before I move on. You have no 8 recollection of any discussion that you 9 had with Ms. Isaacson or anybody that was 10 with her? 11 A. That is not what I said. 12 Q. Do you have any recollection of 13 any discussion you had with Ms. Isaacson 14 or anyone else who was with her? 15 A. Yes, I do. 16 Q. What do you recall? 17 A. I recall asking Ms. Isaacson why 18 is she taking my lectures, and I said I 19 need my lectures. I use those for 20 teaching. 21 Q. Do you recall her response, if 22 any? 23 A. She didn't tell me why she was 24 taking them. 25 Q. Do you recall any other	Page 24
1 WILSON 2 upcoming class but in preparation for a 3 lecture. 4 Q. How far away from -- 5 MR. MARK KLEIN: Withdrawn. 6 Q. You have an office at the 7 Graduate Center For Worker Education, 8 correct? 9 A. Correct. 10 Q. On what floor of the building at 11 25 Broadway was your office? 12 A. Seventh. 13 Q. Seventh floor? 14 A. But I didn't finish the first 15 question you asked me. You asked me who 16 else was present, and you didn't let me 17 finish my answer. 18 Q. Who else was present? 19 A. Well, there was the -- there 20 are -- I think there were other staff 21 members who I don't recall from -- from 22 the Center For Worker Education -- from 23 the Graduate Center For Worker Education. 24 There were representatives from the 25 Manhattan institute of management. There	Page 23	1 WILSON 2 discussion you had other than what you've 3 testified to with either Ms. Isaacson or 4 anybody who was with her? 5 A. Well, the -- she was with a 6 gentleman who introduced himself, but we 7 had no discussion. 8 Q. Was it somebody from Brooklyn 9 College who introduced himself? 10 A. No. 11 Q. Do you recall anything else that 12 was said between you and any -- and 13 Ms. Isaacson and any of the people who 14 were with her besides what you have 15 testified on this day in late January of 16 2012 when you say your office was 17 "Raided"?	Page 25

<p>1 WILSON 2 other exchanges of information. No, 3 other than the fact that they had -- I saw 4 no identification, and I am not sure 5 whether they were carrying guns or not, 6 but that was -- 7 Q. Was the person who gave the 8 instructions that you just testified about 9 a man or a woman? 10 A. A man. 11 Q. Was it a uniformed person or 12 not? 13 A. Plain clothes. 14 Q. Again, other than what you have 15 testified to, do you recall anything else 16 that was said either by you or 17 Ms. Isaacson or the people who were with 18 her on this day in late January that you 19 have been testifying about? 20 A. Yes. I recall now that there 21 were two observers present from the 22 professional staff congress. 23 Q. Well, did either of those 24 observers say anything? 25 A. They said something to me.</p>	<p>Page 26</p> <p>1 WILSON 2 Ms. London, Professor Ness, and Ms. Miller 3 were present on the day of the event 4 you've been describing, correct? 5 A. That's correct. 6 Q. How far away from your office 7 were these people? 8 A. They were in different 9 positions, so they weren't equivalent 10 distances away. 11 Q. Was the door to your office open 12 or closed during the time that 13 Ms. Isaacson and the people with her were 14 in your office? 15 A. I observed it as being both open 16 and both closed. 17 Q. How long after the "raid" that 18 you have referred to -- 19 MR. MARK KLEIN: Withdrawn. 20 Q. How long after the "Raid" 21 started did you arrive? 22 A. I don't know precisely when it 23 started so -- so I can't answer that the 24 way you phrased it. 25 Q. Did you ask anybody how long</p>
<p>1 WILSON 2 Q. What did they say? 3 A. They said we are here to witness 4 and to observe this. 5 Q. Did they give you their names? 6 A. One name I remember, first name 7 Renee. There was also a gentleman whose 8 name I don't recall. 9 Q. Did you say anything in response 10 to they're telling that they were there to 11 witness and observe this? 12 A. Yes. I said what is going on to 13 them. 14 Q. And what, if anything, did they 15 respond? 16 A. They said we don't know. 17 Q. All right. Other than what you 18 have testified to before, did you or 19 Ms. Isaacson or any of the people that she 20 was with say anything else during this 21 event in late January of 2012 at your 22 office at 25 Broadway? 23 A. At the moment, at this moment 24 that is all that I can recollect. 25 Q. Now, you testified before that</p>	<p>Page 27</p> <p>1 WILSON 2 Ms. Isaacson and the people with her had 3 been there before you arrived? 4 A. No. 5 Q. Did anyone at any time explain 6 to you the purpose for entering your 7 office on this day in late January 2012? 8 A. No, not that I can recall. You 9 mean on that day? 10 Q. Yes. 11 A. No. 12 Q. How long were Ms. Isaacson and 13 the people with her there during the time 14 that you were also present? 15 A. Approximately an hour. 16 Q. And do you know what time of day 17 Ms. Isaacson and the people with her left 18 on that day in late January 2012? 19 A. What time they left? 20 Q. Yes. 21 A. It would have been late 22 afternoon, early evening about an hour or 23 so later after I arrived. 24 Q. And when they left, did they 25 lock the door to your office?</p>

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<p>1 WILSON</p> <p>2 A. No.</p> <p>3 Q. Were you able to get into your 4 office?</p> <p>5 A. Yes.</p> <p>6 Q. And so you went in to your 7 office after they left, and did you 8 observe what, if anything, had been taken?</p> <p>9 A. It would have been impossible to 10 know what was taken.</p> <p>11 Q. Why was it impossible to know 12 what was taken?</p> <p>13 A. When you have an office with 14 hundreds of things, how would you know out 15 of hundred of things what was taken and 16 what wasn't.</p> <p>17 Q. Well, let's talk a minute about 18 your office. What were the dimensions of 19 your office on the 7th floor of 25 20 Broadway back in 2012?</p> <p>21 A. I would say approximately 20 by 22 15 approximately.</p> <p>23 Q. Dr. Wilson, I am going to give 24 you a blank piece of paper and a pen.</p> <p>25 A. I've got a pen.</p>	<p>Page 30</p> <p>1 WILSON</p> <p>2 moved from another office into that one, 3 the one you just drew?</p> <p>4 A. Approximately.</p> <p>5 Q. Did the office that you just 6 drew for us, did it have an office number 7 or letter, any designation?</p> <p>8 A. I believe it was -- maybe it was 9 7 or maybe it was 705 or 75.</p> <p>10 Q. Is it 7-5, something like that?</p> <p>11 A. I am -- it is either 75 or 705.</p> <p>12 Something like that approximately.</p> <p>13 Q. All right. So were you inside 14 the office while Ms. Isaacson and the 15 people who were with her were in your 16 office?</p> <p>17 A. No.</p> <p>18 Q. So you testified that the door 19 was unlocked after Ms. Isaacson and people 20 with her left, correct?</p> <p>21 A. Correct.</p> <p>22 Q. You then you went into your 23 office?</p> <p>24 A. Yes, I did.</p> <p>25 Q. Did you make any effort to</p>
<p>1 WILSON</p> <p>2 Q. What I would like you to do is 3 draw the outlines of your office at -- on 4 the seventh floor at 25 Broadway back in 5 2012. If you would make it a good size, 6 so we can identify the things in it to the 7 best of your ability.</p> <p>8 A. (Witness complies.)</p> <p>9 Q. Thank you.</p> <p>10 Can you direct us to north or 11 south or east or west?</p> <p>12 A. North or south. Let's see. I 13 think this --</p> <p>14 MR. JAMES KLEIN: You don't 15 have to guess.</p> <p>16 A. This probably would have been 17 north.</p> <p>18 Q. Okay. And the window, did that 19 look out on Broadway?</p> <p>20 A. I'm not sure. I don't think 21 so.</p> <p>22 Q. How long had you occupied that 23 office as of 2012?</p> <p>24 A. About three years.</p> <p>25 Q. So three years before you had</p>	<p>Page 31</p> <p>1 WILSON</p> <p>2 determine what materials were missing, if 3 any?</p> <p>4 A. At that moment, I was rather 5 stunned and met with my staff like what is 6 going on. What was going on? And that 7 was my initial -- so, no, I wasn't 8 starting to look at what is missing. No.</p> <p>9 Q. What, if anything, did you see 10 Ms. Isaacson and the people with her carry 11 out with them when they left besides the 12 folder which you thought were your lecture 13 notes?</p> <p>14 A. Well, Ms. Isaacson had a stack 15 of papers or files. Other than the 16 lecture notes that is all I know, and I 17 think others carried things out, but I 18 really wasn't focusing on that.</p> <p>19 Q. So you said Ms. Isaacson had a 20 stack she carried in her own arms?</p> <p>21 A. Correct.</p> <p>22 Q. Some files; is that right?</p> <p>23 A. She had some files in her arms.</p> <p>24 Q. Were these loose papers or were 25 these in folders or manilla folders of any</p>

<p>1 WILSON 2 kind? 3 A. They were in files. 4 Q. When you say they were in files, 5 what kind of files? 6 A. These would have been manilla 7 and brown files. 8 Q. And approximately how many 9 manilla and brown files did Ms. Isaacson 10 have in her arms when she left your office 11 on this day in late January 2012? 12 A. Well, because I don't know the 13 thickness of each file, I couldn't give 14 you an exact answer. 15 Q. Well, what is your best 16 approximation as to how many files? 17 A. Several. 18 Q. Several being more than five? 19 A. As I said, I can't tell you 20 exactly, so I don't know if it was five, 21 three, eight. I can't tell you. 22 Q. You have no approximation 23 whatsoever as to how many files 24 Ms. Isaacson had in her arms? 25 A. Well, let's say between 3 and</p>	<p>Page 34</p> <p>1 WILSON 2 A. I've taught many classes. 3 Q. How many classes were you 4 teaching in January of 2012? 5 A. Probably two at the Center For 6 Worker Education. 7 Q. And what were those two classes? 8 A. I'm not sure. 9 Q. Now, you testified that after 10 Ms. Isaacson and the people who were with 11 her left your office you were stunned and 12 you talked with your staff but did not at 13 that time try to determine what papers had 14 been taken; is that correct? 15 A. That's right. 16 Q. At any time thereafter did you 17 make any effort to determine what papers, 18 if any, had been taken? 19 A. Well, yes. I asked -- I asked 20 Ms. Miller and Ms. London what had been 21 taken, and they said that computer hard 22 drives had been taken including one of my 23 computer hard drives. 24 Q. All right. Besides the 25 computer hard drives, did you at any time</p>
<p>1 WILSON 2 10. 3 Q. You testified before that 4 Ms. Isaacson had among the papers she took 5 with her your lecture notes; is that 6 right? 7 A. That's the file that I saw. 8 Q. Did Ms. Isaacson show the 9 lecture notes to you? 10 A. No. 11 Q. How did you know they were 12 lecture notes? 13 A. Because it was on top of the 14 stack that she was carrying and it had the 15 class or the lecture that I was going to 16 give. 17 Q. And what class was listed? 18 A. I don't recall the specific 19 class. 20 Q. What were you teaching at that 21 time, what courses? 22 A. Let's see. I would have to 23 double-check the record. Public 24 administration probably but -- 25 Q. You're not sure?</p>	<p>Page 35</p> <p>1 WILSON 2 make any effort to determine what files 3 had been taken? 4 A. Well, I -- you know, 5 subsequently speaking with staff asking 6 what were they looking for, and we didn't 7 know, so I guess that would be the answer. 8 Like what are they looking for, so -- 9 Q. That's not what I asked you, Dr. 10 Wilson. I asked you at any time after 11 Ms. Isaacson and the people with her left 12 your office on this day in late January 13 2012 did you make any effort to determine 14 what files, if any, were missing from your 15 office? 16 A. No. 17 Q. And why didn't you do that? 18 A. Well, I think just because of 19 the trauma of the situation, and I was 20 most immediately focused on being able to 21 conduct my teaching. So my main concern 22 was getting back my teaching file. That 23 was my preeminent concern. How would I 24 teach without my files. 25 Q. Did you ever ask for the return</p>

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1 WILSON 2 of your teaching file? 3 A. Yes, I did. 4 Q. When? 5 A. I actually said to Ms. Isaacson 6 I want my file back. 7 Q. And when did you say that to 8 Ms. Isaacson? 9 A. When she was on her way out. 10 Q. Okay. 11 A. As I recall. 12 Q. At any time after the day on 13 which you allege Ms. Isaacson took your 14 teaching file, did you make a request for 15 its return? 16 A. I -- yes, I did. 17 Q. And did you make that request in 18 writing or orally? 19 A. That would have been -- well, at 20 some point I asked in writing for my files 21 back. 22 Q. And when did you ask in writing 23 for your files back? 24 A. That would have been in February 25 of 2012, that month, you know, in the next	Page 38	1 WILSON 2 copy of your files in writing by e-mail to 3 Pam Pollack; is that right? 4 A. That is my recollection. 5 Q. Now, you testified that you saw 6 Ms. Isaacson leave your office 7 with between three and ten files in her 8 arms, correct? 9 A. Correct. 10 Q. Did you see what any of the 11 people with her had in their arms, hands, 12 when they left your office that day in 13 late January 2012? 14 A. I was mainly focused on 15 Ms. Isaacson. 16 Q. So the answer to the 17 question -- to my question is no, you 18 didn't see whether anybody else had 19 anything else in their hands or arms when 20 they left your office? 21 A. I'm not sure. I'm not sure. 22 I think her colleague had some files as 23 well. 24 Q. And when you say her colleague, 25 who are you referring to?	Page 40
1 WILSON 2 couple of weeks. 3 Q. So it is your testimony that 4 sometime in the next couple of weeks you 5 asked for the return of your teaching 6 files; is that right, in writing? 7 A. Well, yes. That's correct. 8 Q. And did you make this request by 9 e-mail or in some other way? 10 A. By e-mail. 11 Q. And to whom did you send this 12 request? 13 A. Pam Pollack. 14 Q. Now, did you ever ask for a copy 15 of any of the files that had been removed 16 from your office? 17 A. Yes. 18 Q. When? 19 A. That would have been probably in 20 February of 2012. 21 Q. And to whom did you make that 22 request? 23 A. That also would have been to 24 Brooklyn College counsel Pam Pollack. 25 Q. And you made a request for a	Page 39	1 WILSON 2 A. She was with another gentleman 3 whose name I don't recall. 4 Q. And can you describe this 5 gentleman? 6 A. African American. I think he 7 was middle aged, maybe younger than middle 8 aged, and medium height as I recall. 9 Q. Have you told me everything you 10 recall about this gentleman who you 11 thought may have had some files in his 12 arms? 13 A. Repeat the question. 14 Q. You've described this gentleman 15 as African American, maybe younger than 16 middle aged, and medium height. Can you 17 describe him in any further way? 18 A. Yes. 19 Q. How? 20 A. He had on a suit and a tie. 21 Q. And he didn't identify himself 22 to you? 23 A. He may have or Ms. Isaacson may 24 have introduced him by name, but he didn't 25 have on any identifying badge or anything.	Page 41

<p>1 WILSON 2 Q. And how many files, if any, did 3 this gentleman that you've described have 4 in his hands or arms when he left? 5 A. I don't remember precisely. I 6 don't remember. 7 Q. All right. Now, we started 8 this whole line of questioning because I 9 asked you about the entry at the bottom of 10 page 2 of Wilson Exhibit 1 with regard to 11 Natalie Miller. By the way Natalie 12 Miller, is that person also known as Pam 13 Miller? 14 A. Correct. 15 Q. So other than the raid that -- 16 "Raiding" that you've described, did 17 Ms. Miller witness any other "Seizure and 18 destruction and removal of plaintiff's 19 property and loss of mail" other than what 20 you've already testified to? 21 A. Well, yes. 22 Q. What? 23 A. Subsequent to the raid -- do you 24 mean during the raid? 25 Q. At any other time.</p>	<p>Page 42</p> <p>1 WILSON 2 on after this "Raid" that left you stunned 3 to use your word did you attempt to reach 4 out to any member of the Brooklyn College 5 administration to find out what this was 6 all about? 7 A. Well -- 8 Q. You can answer that yes or no. 9 A. Yes. 10 Q. And if so to whom did you 11 attempt to reach out to? 12 A. I attempted to reach out to Pam 13 Pollack. I reached out to Barbara 14 Haugstatter. 15 A. I reached out to Dean Phillips. 16 I reached out to Juan Carlos, who was the 17 dean at City College. 18 Q. Anybody else? 19 A. Well, of Brooklyn College 20 administration? 21 Q. Yes. 22 A. I think those would have been 23 all that I could recall at the moment. 24 Q. So you contacted Pam Pollack, 25 Barbara Haugstatter, Dean Phillips, Juan</p>
<p>1 WILSON 2 A. Yes. Subsequent to the raid, I 3 believe on the last week of January the 4 locks to my door were changed, and -- and 5 Ms. Miller said on the following 6 week -- oh, and I was -- I was banned, so 7 I had no -- no longer had access to my 8 office or to the 7th floor at 25 Broadway. 9 I was told in a meeting that I could no 10 longer go there. 11 Q. All right. You said a few 12 things there. You said that "Raid" took 13 place the last week of January 2012, 14 correct? 15 A. Correct. 16 Q. How long thereafter were the 17 locks to your office changed to your 18 knowledge? 19 A. A few days. 20 Q. And there was still some time in 21 January of 2012? 22 A. I believe the last Friday of 23 January. That's my recollection. 24 Q. All right. I want to ask you 25 some more about that, but before we move</p>	<p>Page 43</p> <p>1 WILSON 2 Carlos to find out what was going on; is 3 that right? 4 A. Correct. 5 Q. Did you contact each of these 6 people orally? 7 A. By phone. 8 Q. Did you contact any of them by 9 e-mail? 10 A. Pam Pollack. 11 Q. Well, you've testified that you 12 contacted Ms. Pollack a couple of weeks 13 later about trying to get your lecture 14 notes back, right? 15 A. Right. 16 Q. Separate from that, did you have 17 e-mail communications with Ms. Pollack? 18 A. In terms of e-mail, that was the 19 nature of my e-mail to Pam. 20 Q. What, if anything, did 21 Ms. Pollack tell you when you contacted 22 her to find out what was going on? 23 A. My recollection is that 24 Ms. Pollack said I can't give you any 25 information, and this is CUNY, the City</p>

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<p style="text-align: right;">Page 46</p> <p>1 WILSON 2 University of New York that is doing this, 3 and -- and that's -- so she was very 4 enigmatic, quite mysterious. 5 Q. Did Ms. Pollack at any time 6 inform you what was going on? 7 A. No. 8 Q. You said you reached out to 9 Barbara Haugstatter? 10 A. Yes. 11 Q. And she is the secretary to the 12 chairman of the political science 13 department; is that right? 14 A. At that time, correct. 15 Q. And is there a reason you 16 reached out to the secretary to the 17 chairman of the political science 18 department to find out what was going on? 19 A. Yes. 20 Q. What is the reason? 21 A. Well, the reason was again, 22 first, I had no idea what was going on, 23 and so one of my initial concerns was that 24 I had two large potted plants that -- they 25 are personal plants in the office, and I</p>	<p style="text-align: right;">Page 48</p> <p>1 WILSON 2 Education, did she? 3 A. Yes, she did. 4 Q. What did she do? 5 A. Well at some points she actually 6 held office, maintained an office or went 7 to 25 Broadway, and then she also 8 interacted with our administration of the 9 program on a regular basis almost daily. 10 Q. What did you say to 11 Ms. Haugstatter and what did she say to 12 you regarding the pot the /-D plants and 13 large easel? 14 A. Well, at that point I 15 extended -- my /-P first call was like 16 where are my plants? You know I don't want 17 my plants to die and I got to get my easel 18 back. And I said you know, let me come 19 by and pick them up. And initially she 20 said okay I will see what I can do. And 21 then I called her subsequent to that, a 22 few days later, and I said well I am also 23 concerned about my files. I need -- I 24 have to conduct teaching, I know, my 25 research. I need my things.</p>
<p style="text-align: right;">Page 47</p> <p>1 WILSON 2 wanted those to make sure that they didn't 3 die from lack of water if it was going to 4 go on for more than a week or two. I had 5 no idea, and that was my initial concern. 6 Like my plants are going to die if I can't 7 take care of them. 8 Q. So you're talking about two 9 potted plants in your office at 25 10 Broadway? 11 A. And an easel that was an oak 12 easel there that was actually my wife's 13 oak easel, a display easel, and the easel 14 was used to put a schedule of daily events 15 and classes and so forth, but it was an 16 art easel solid observing, and so my first 17 concern the first few days was take care 18 of my plants and I I want my easel back 19 for my wife, and that was my initial -- 20 Q. Now, Ms. Shag /STET enter is on 21 the Brooklyn campus at Brooklyn College, 22 correct? 23 A. At that point, yes. Correct. 24 Q. She didn't have anything to do 25 with the Graduate Center For Worker</p>	<p style="text-align: right;">Page 49</p> <p>1 WILSON 2 Q. What did she say? 3 A. I'll speak to Paisley. 4 Q. The Paisley you are referring to 5 is Paisley Currah was he chairman of the 6 department at that time of political eye 7 science? 8 A. Yes, he was the newly elected 9 chair who actually ran against me for the 10 chairmanship in 2011 May. 11 Q. Did you ever have any full up 12 conversations with Barbara lag /STET enter 13 regard being your plants and your easel 14 and your files? 15 A. Yes. 16 Q. When? 17 A. In the following weeks I called 18 Barbara again that I have had no 19 satisfaction on recovering my property, 20 that now this is you know -- this is 21 getting -- this is getting crazy, and also 22 I am no longer receiving my mail 6789. 23 Q. And what, if anything, did 24 Ms. Haugstatter respond in your 25 conversations with her in the following</p>

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<p>1 WILSON 2 weeks regarding those subjects? 3 A. She said I am sorry Joe. I'll 4 speak with Paisley. She didn't say 5 doctor consider a. She said I'll speak 6 with Paisley. 7 Q. Now, you testified you also 8 spoke with Dean Phillips? 9 A. Yes. 10 Q. Now, what was Dean Phillips dean 11 of? 12 A. You mean her exact title? 13 Q. Yes. 14 A. I think she was the dean of arts 15 and sciences, but I am not sure if she was 16 ungraduate dean. She may have just been 17 undergraduate. I am not sure of her full 18 title. She is either graduate or 19 undergraduate dean in the arts and 20 sciences department, as I recall. 21 Q. Why did you contact her to find 22 out what was going on? 23 A. Well, she -- administratively 24 she may have had some understanding of 25 what was going on, and then, you know, she</p>	<p>Page 50</p> <p>1 WILSON 2 A. And I said -- I asked her what 3 are they investigating. 4 Q. And what did she say? 5 A. She said I can't discuss that. 6 Q. Did you have any other 7 conversations with Dean Phillips regarding 8 what was going on besides what you've 9 testified to? 10 A. At the moment that is all I can 11 recall. 12 Q. Now, you testified you also 13 spoke with Juan Carlos who is the dean at 14 City College, right? 15 A. Yes. 16 Q. And why did you contact him? 17 A. Well, administratively it was 18 important because we occupied joint space, 19 so he was naturally concerned as I was 20 concerned with this raid because he was 21 aware of the raid. He also wondered what 22 they were looking for, and so that was the 23 nature of our conversation. 24 Q. Did you attempt to speak to 25 anyone at CUNY regarding what was going</p>
<p>1 WILSON 2 had meetings with the president and so 3 forth. So I asked her what was going on. 4 Q. And how soon after the "Raid" 5 did you contact Dean Phillips? 6 A. I would say within the next 7 couple of weeks. 8 Q. You can't be any more specific? 9 A. No. 10 Q. And you contacted Dean Phillips 11 by telephone? 12 A. By telephone. 13 Q. And as best you can recall what 14 did you say to her and what did she say to 15 you in this telephone conversation? 16 A. I asked her what is going on, 17 you know, what was up with this raid, what 18 are they looking for? How come I can't 19 have access to my office, to my research, 20 to my files, to my documents, to my 21 hundreds of books, and my recollection is 22 she said that CUNY is conducting an 23 investigation. 24 Q. Do you remember anything else 25 she said to you?</p>	<p>Page 51</p> <p>1 WILSON 2 on? 3 A. When you say at CUNY, what do 4 you mean? 5 Q. Separate from Brooklyn College, 6 did you attempt to speak to any CUNY 7 representatives? 8 A. Well, the union, the 9 professional staff congress, if that's 10 what you mean. 11 Q. That's not what I meant, but 12 that's fine. So you spoke -- you 13 contacted someone at the union? 14 A. Yes, I was in touch with the 15 union. 16 Q. When? 17 A. Well, immediately the night of 18 the raid because the union sent two 19 representatives. 20 Q. Thereafter did you speak with 21 anyone at the union? 22 A. And -- yes, I spoke on the 23 following Monday with Pete Zwiebach. He 24 is union counsel for the Professional 25 Staff Congress.</p>

<p>1 WILSON 2 Q. And were you able to obtain any 3 information as to what was going on? 4 A. Pete told me that -- 5 MR. JAMES KLEIN: Hold on. I 6 think his communications with Pete, who 7 was his counsel, I think those are 8 privileged. 9 MR. MARK KLEIN: Well, I don't 10 know if there was any communication or 11 advice. If he asked him what is going 12 on, that is not asking for -- 13 MR. JAMES KLEIN: He was 14 counsel for the union, and he was 15 represented by the union. What is going 16 on is -- I mean there was an 17 investigation, an internal investigation, 18 which is a formal legal proceeding, and 19 the counsel for the union was representing 20 Joe, and they were having discussions, and 21 I believe that is privileged. 22 MR. MARK KLEIN: Are you 23 directing him not to answer? 24 MR. JAMES KLEIN: Yes. 25 Q. Mr. Zwiebach subsequently</p>	<p>Page 54</p> <p>1 WILSON 2 A. Well, I know why they were 3 present. 4 Q. Could you answer my question? 5 A. Yes. 6 Q. Did you discuss with anyone at 7 PSC what led them to send two 8 representatives to be present on -- 9 A. Yes. 10 Q. And what did they say to you and 11 what did you say to them? 12 A. I contacted the union upon 13 entering 25 Broadway to send over 14 representatives, and they were right down 15 the street, and so they came over quickly. 16 Q. So it is your testimony that 17 there were no PSC representatives before 18 you arrived? 19 A. That's correct. That is my 20 recollection. 21 Q. And did Renee ever provide you 22 any information as to what was going on? 23 A. No. 24 Q. Going back to your entry for Pam 25 Miller at the bottom of page 2 of Exhibit</p>
<p>1 WILSON 2 represented you in connection with the 3 termination proceedings that Brooklyn 4 College and CUNY brought, correct? 5 A. Correct. 6 Q. Did you ever speak to anybody at 7 the union besides Mr. Zwiebach, regarding 8 what was going on? 9 A. Yes. 10 Q. Who? 11 A. Renee. 12 Q. And Renee was one of the people 13 who was present on the -- at the "Raid" to 14 use your word that you've described? 15 A. Correct. 16 Q. And what did Renee tell you 17 about what was going on, if anything? 18 A. I met with Renee just to figure 19 out what was going on, so she didn't know. 20 Q. She didn't tell you anything? 21 A. No. 22 Q. Did you ask Renee or anyone else 23 at PSC what had led to their sending two 24 representatives to be present when the 25 "Raid" took place?</p>	<p>Page 55</p> <p>1 WILSON 2 1, have you told me everything that 3 Ms. Miller has knowledge of regarding the 4 "Seizure and destruction and removal of 5 plaintiff's property and loss of mail 6 delivery"?</p> <p>7 MR. JAMES KLEIN: I think that 8 is a much too confusing compound question. 9 A. Rephrase it.</p> <p>10 MR. MARK KLEIN: He has 11 described for me some facts of which he 12 believes Ms. Miller is aware of regarding 13 that matter. I am asking if there is 14 anything he hasn't told me. That is a 15 very straightforward question.</p> <p>16 A. Well, Ms. Miller and I -- 17 MR. JAMES KLEIN: No, I don't 18 think that is a straightforward question. 19 Q. Answer the question, sir. 20 A. Ms. Miller and I discussed the 21 raid, and we were trying to figure out 22 what the raid was about. 23 Q. Did Ms. Miller witness any other 24 "Seizure and destruction and removal of 25 plaintiff's property and loss of mail</p>

<p>1 WILSON 2 delivery" other than what you have 3 testified to? 4 MR. JAMES KLEIN: That calls 5 for speculation. He doesn't know 6 everything that she may have witnessed. 7 MR. MARK KLEIN: I am asking 8 for his knowledge. He can't testify 9 about what he doesn't know, but he can 10 testify about what he does know. 11 MR. JAMES KLEIN: You asked him 12 what does she know. 13 Q. To the best of your knowledge, 14 sir, other than what you have testified 15 are you aware of any other facts of which 16 Ms. Miller is aware -- 17 MR. JAMES KLEIN: I believe 18 that is an improper question. 19 MR. MARK KLEIN: You are 20 interrupting my question. That is 21 inappropriate. You're obstructing the 22 deposition. Cut it out. Now, I am 23 going to ask the question again, and I 24 don't want to be interrupted, and there is 25 nothing wrong with the question to begin</p>	<p>Page 58</p> <p>1 WILSON 2 Ms. Miller regarding the subject of 3 "Seizure and destruction and removal of 4 plaintiff's property and loss of mail 5 delivery" referred to at the bottom of 6 page 2 of Exhibit 1? 7 A. Repeat the question. 8 Q. Other than your mail, did you 9 have any other discussions with 10 Ms. Miller -- please don't write on the 11 document. That is an exhibit. 12 A. Do you have one that is not an 13 exhibit that I can write on? 14 Q. No. 15 A. Then I will -- 16 Q. You can write on your counsel's 17 copy. 18 A. I'll write the question. What 19 is the question? 20 Q. Is this too complicated for you, 21 Doctor? 22 A. I just want to be precise. 23 MR. JAMES KLEIN: There is no 24 reason to harass him. 25 Q. You have testified about</p>
<p>1 WILSON 2 with. 3 Q. Dr. Wilson, other than what 4 you've testified to you, are you aware of 5 any other facts of which Ms. Miller is 6 aware regarding the subject of "Seizure 7 and destruction and removal of plaintiff's 8 property and loss of mail delivery" 9 referred to at the bottom of page 2 of 10 your initial disclosure? 11 MR. JAMES KLEIN: I am going to 12 object to that question because it calls 13 for speculation. He is not aware of what 14 she knows. 15 MR. MARK KLEIN: You've made 16 your record. 17 Q. You can answer the question, Dr. 18 Wilson. 19 A. Well, I asked Ms. Miller 20 specifically about my mail. 21 Q. And what did she tell you? 22 A. And she said I was no longer 23 receiving mail. 24 Q. Other than your mail, did you 25 have any other conversations with</p>	<p>Page 59</p> <p>1 WILSON 2 conversations you had with Pam Miller. I 3 just want to know if there is anything you 4 haven't told me about that subject matter 5 that is listed here. 6 A. Yes. We talked about Cory 7 Robin and Paisley Currah, and their 8 ongoing malice towards the program. 9 Q. Does what you just responded to 10 my question have anything to do with 11 "Seizure and destruction and loss of 12 plaintiff's mail delivery"? Yes or no. 13 A. Yes. 14 Q. How does that have to do with 15 that? 16 A. We speculated that Robin and 17 Currah were involved. 18 Q. Okay. Have you told me 19 everything that you have discussed with 20 Ms. Miller regarding the subject matter 21 set forth at the bottom? 22 A. That is all that I can recall. 23 Q. Okay. So that wasn't so hard, 24 was it? 25 At the top of page 3, you</p>

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<p>1 WILSON 2 identify Josh Board, and with regard to 3 him you state in your initial disclosures 4 "Witnessed seizure and destruction of 5 plaintiff's property at 25 Broadway." 6 Do you see that? 7 A. No. 8 Q. You don't see that at the top of 9 page 3? 10 A. Yes, I see it. 11 Q. Okay. Now, who is Mr. Board? 12 A. Josh Board is a graduate student 13 at the Graduate Center For Worker 14 Education, and he was a part-time employee 15 in the capacity of a receptionist and an 16 assistant, as I recall. 17 Q. Okay. Was he present on the day 18 of the "Raid" in late January 2012? 19 A. He may have been. 20 Q. To the best of your knowledge, 21 what information does he have regarding 22 "Seizure and destruction of plaintiff's 23 property"?</p> <p>24 MR. JAMES KLEIN: Again, that 25 calls for speculation.</p>	<p>Page 62</p> <p>1 WILSON 2 from the administrative offices. 3 Q. This is in February of 2012? 4 A. February of 2012. 5 Q. Did you ask him what items were 6 being removed and thrown out? 7 A. I didn't ask him specifically. 8 Q. Did he tell you what items were 9 being removed and thrown out? 10 A. He just said they were throwing 11 out stuff. 12 Q. You didn't ask him what they 13 were throwing out? 14 A. He didn't know. 15 Q. How did you know he didn't know 16 if you didn't ask him? 17 A. Well, he didn't describe it to 18 me. He said they were throwing out 19 stuff, and I took that -- and he said they 20 are throwing out a lot of stuff, papers 21 and -- he was not specific. 22 Q. Did he say people were throwing 23 out stuff from your office? 24 A. Yes, from my office, from the 25 administrative offices.</p>
<p>1 WILSON 2 MR. MARK KLEIN: It is not 3 speculation. Your client -- please let me 4 finish. Your client has identified Mr. 5 Board as someone who has "Knowledge of 6 discoverable facts" and has identified him 7 as "Having witnessed the seizure and 8 destruction of plaintiff's property at 25 9 Broadway." So I am trying to find out 10 why he wrote that down there or why you 11 wrote that down there on page 3. 12 MR. JAMES KLEIN: I'll object. 13 I did not write it down. I mean that is a 14 completely improper statement to make. 15 MR. MARK KLEIN: That is very 16 helpful, Mr. Klein. Thank you. 17 Q. What seizure and destruction of 18 plaintiff's property at 25 Broadway did 19 Mr. Board witness? 20 A. So at that time -- 21 Q. What time? 22 A. This would have been in February 23 of 2012. Josh was working at 25 Broadway, 24 and he mentioned to me -- he told me that 25 items were being removed and thrown out</p>	<p>Page 63</p> <p>1 WILSON 2 Q. From the administrative offices, 3 not from -- 4 A. Three -- well my -- my property 5 was not only in my office. My property 6 was in different locations. 7 Q. So your property was in 8 different locations at -- 9 A. That's correct. 10 Q. -- 25 Broadway on the 7th floor; 11 is that correct? 12 A. That's correct. 13 Q. Let's go back to the drawing of 14 your office. 15 MR. MARK KLEIN: If I could have 16 that please and ask the reporter to mark 17 this drawing AS Wilson Exhibit 2. 18 (Wilson Exhibit 2 marked for 19 identification.) 20 Q. By the way, Dr. Wilson, you just 21 said that Mr. Board told you "they" were 22 throwing a lot of stuff out, right? 23 A. Correct. 24 Q. Who is the they? 25 A. The only person he mentioned at</p>

1 WILSON 2 that moment was Cory Robin. 3 Q. Did he mention anyone else at 4 any other time? 5 A. No. 6 Q. Now, you've drawn the outlines 7 of your office, and you previously 8 testified that the dimensions were 20 by 9 15 I think you said? 10 A. Approximately. 11 Q. So it is approximately 20 feet 12 north to south and 15 feet east to west; 13 is that correct? 14 A. North to south 20, 15 15 approximately -- no. No. No. Yes, 20 16 north to south and about 15 east to west. 17 Q. All right. Now, did you have 18 any furniture inside your office? 19 A. Yes. 20 Q. What did you have -- what 21 furniture did you have inside your office? 22 A. Desks, file cabinets, 23 bookshelves, plants. Let's see. 24 Chairs. I think that is it. 25 Q. How many desks did you have?	Page 66	1 WILSON 2 A. I'm not sure. There may have 3 been four. 4 Q. What kind of file cabinets were 5 these? 6 A. Metal. 7 Q. What were the approximate 8 dimensions of these file cabinets? 9 A. Let's see. Maybe three feet in 10 length, maybe two and a half, three feet 11 high, and maybe a foot and a half wide 12 approximately. 13 Q. And what was in these file 14 cabinets? 15 A. Records, documents, research. 16 Q. Were they organized in any 17 particular way? 18 A. Yes. 19 Q. What way? 20 A. By title, by topic, by alphabet, 21 depending on the file by chronology. 22 Q. Anything else? 23 A. Anything else in terms of what? 24 Q. How these files were organized. 25 A. Title, category, chronology. I	Page 68
1 WILSON 2 A. It would have been two desks. 3 Q. Could you draw the location of 4 those two desks, please? 5 A. (Witness complies.) 6 Q. And did those desks have chairs? 7 A. Yes. 8 Q. So the L indicates a chair 9 behind the desk? 10 A. Correct. 11 Q. And did you use both of those 12 desks? 13 A. I did. 14 Q. Now, you said there were file 15 cabinets in your office? 16 A. Yes. 17 Q. How many file cabinets were 18 there? Just just tell me how many there 19 were first. 20 A. I have to think about it. 21 MR. MARK KLEIN: Okay. Let the 22 record reflect that Dr. Wilson has put Xs 23 in three locations. 24 Does that indicate the location 25 of file cabinets?	Page 67	1 WILSON 2 think those would have been mainly -- 3 Q. Have you finished your answer? 4 A. Yes. 5 Q. You also had bookshelves in this 6 office? 7 A. Yes. 8 Q. Where were the bookshelves? How 9 many were there first of all? 10 A. The entire wall was bookshelves 11 wall to wall. 12 Q. So the entire east wall? 13 A. Floor to ceiling. Right. 14 Q. The entire east wall? 15 A. Right. 16 Q. Were these bookshelves wooden or 17 something else? 18 A. They are wooden. 19 Q. Were the books in all the 20 shelves? 21 A. Yes. Books, files, documents. 22 Yes. 23 Q. How were the books organized, if 24 at all? 25 A. Well, there was one shelf of	Page 69

<p style="text-align: right;">Page 70</p> <p>1 WILSON 2 what I would consider to be special books. 3 These were, for example, The Encyclopedia 4 of Protest and Revolution, which was an 5 eight-volume encyclopedia and on the shelf 6 with that and -- on that particular shelf 7 would have been other unique books to my 8 own research and my own professional 9 interests that, you know, authors would 10 provide to me and so forth.</p> <p>11 Q. Where was the shelf of special 12 books?</p> <p>13 A. If you come in through the door 14 and you go to the right, it would have 15 been on the bottom shelf closer to the 16 window.</p> <p>17 Q. Could you use the initials SB 18 for special books where this shelf with 19 special books was located.</p> <p>20 A. (Witness complies.) And I am not 21 sure whether it was the bottom shelf or 22 middle shelf, but there was -- I had a 23 shelf of special books.</p> <p>24 Q. And approximately how many 25 special books were on the shelf of special</p>	<p style="text-align: right;">Page 72</p> <p>1 WILSON 2 A. Well, some had been accumulated 3 since 2008, so -- so that's the answer. 4 Some -- these were not all from previous. 5 Some of these were accumulated since 2008.</p> <p>6 Q. Okay. Those that you hadn't 7 accumulated since you moved into that 8 office, where had all these books and 9 files been when you moved -- before you 10 moved into that office in 2008?</p> <p>11 A. Those were at -- in my office at 12 the Graduate Center For Worker Education 13 located at the 99 Hudson Street, and I 14 believe it was on the third floor.</p> <p>15 Q. The space that the Graduate 16 Center For Worker Education had at 99 17 Hudson Street was less than 3,000 square 18 feet, correct?</p> <p>19 A. I don't know the exact square 20 footage.</p> <p>21 Q. What is your best approximation?</p> <p>22 A. I mean I can only guess, so 23 I -- maybe 5,000 square feet. I don't 24 know exactly. 3,000, 5,000. I don't 25 know.</p>
<p style="text-align: right;">Page 71</p> <p>1 WILSON 2 books?</p> <p>3 A. Approximately a hundred.</p> <p>4 Q. And approximately how many books 5 all together did you have on those 6 bookshelves?</p> <p>7 A. Maybe a thousand books, 7, 800.</p> <p>8 I can't say exactly.</p> <p>9 Q. Did you ever create an inventory 10 of all the books you had on the shelves?</p> <p>11 A. No.</p> <p>12 Q. Did you ever create an inventory 13 of all the files you had?</p> <p>14 A. No.</p> <p>15 Q. Now, you had been in that office 16 for only three years; is that right?</p> <p>17 A. A few years.</p> <p>18 Q. Which was it, three or a few?</p> <p>19 A. Approximately three. Three is 20 a few, isn't it?</p> <p>21 Q. So approximately in 2009 you 22 moved into that office?</p> <p>23 A. Maybe 2008.</p> <p>24 Q. And where had all these files 25 and books been before 2008?</p>	<p style="text-align: right;">Page 73</p> <p>1 WILSON 2 MR. JAMES KLEIN: Is that a 3 guess? Don't guess.</p> <p>4 Q. You have no idea how many square 5 feet the Graduate Center For Worker 6 Education had at 99 Hudson Street. Is 7 that what your testimony is?</p> <p>8 A. No, that's not my testimony. I 9 am giving you an approximation.</p> <p>10 Q. What is your approximation?</p> <p>11 What is your best approximation?</p> <p>12 A. My approximation is about 3,000 13 to 4,000 square feet.</p> <p>14 Q. And how big -- you had an office 15 at 99 Hudson Street, you personally?</p> <p>16 A. Yes, personally I had an office.</p> <p>17 Q. And what was the size of that 18 office approximately?</p> <p>19 A. That office was approximately 20 20 feet by 20 feet.</p> <p>21 Q. All right. Going back to Josh 22 Board, number 2 at the top of page 3 of 23 Exhibit 1, when was the last time you 24 spoke with Mr. Board?</p> <p>25 A. I can't remember exactly.</p>

1 WILSON 2 Q. What is your best recollection 3 as to the last time you spoke to Mr. 4 Board? 5 A. Maybe in 2017. 6 Q. And what was the occasion that 7 you spoke to him in 2017? 8 A. So I first asked how he was 9 doing professionally, and he told me about 10 his employment, and then I asked him if he 11 remembered anything about his experience 12 at -- as an employee at the Graduate 13 Center For Worker Education. 14 Q. And what did he tell you? 15 A. He said that he remembered that 16 the period when I was banned. He 17 remembered in that period of time 18 that -- that Cory Robin was insulting 19 towards him. This is what he told me. 20 Q. Did he provide you any 21 additional information as to what files or 22 papers were removed and thrown out? 23 A. Not that I can recall. 24 Q. Did Mr. Board ever tell you what 25 papers had been removed and thrown out?	Page 74	1 WILSON 2 Guscott what information he had regarding 3 what, if anything, was taken and destroyed 4 of your property? 5 A. Yes. 6 Q. When? 7 A. This would have been in February 8 of 2012. 9 Q. Is that the only conversation 10 you had with Mr. Guscott regarding the 11 theft and destruction of your property and 12 mail? 13 A. No, I've had a number -- a 14 subsequent conversation with him. 15 Q. All right. Let's start with 16 February 2012. What did Mr. Guscott tell 17 you regarding the alleged theft and 18 destruction of your property at 25 19 Broadway? 20 A. So. Repeat the question again 21 on Guscott. 22 Q. You testified that you spoke 23 with Mr. Guscott in February 2012 24 regarding the alleged theft and 25 destruction of your property at 25	Page 76
1 WILSON 2 A. Not specifically to my 3 recollection. 4 Q. The next person on the list is 5 Kevin Guscott, G-U-S-C-O-T-T. 6 A. Yes. 7 Q. And he is listed here as having 8 knowledge of "Witness to theft and 9 destruction of plaintiff's property and 10 mail at 25 Broadway." Do you see that? 11 A. I see that. 12 Q. To your knowledge, what 13 information does Mr. Guscott have 14 regarding that subject? 15 A. To my knowledge, Kevin Guscott 16 was an employee at 25 Broadway during that 17 period, and so -- and he also was at the 18 reception desk frequently at 25 Broadway, 19 so he would have been privy to people 20 coming in and out both -- well, let's see. 21 Certainly the front door but also the 22 administrative areas and -- so he would 23 have seen people in and out of various 24 offices. 25 Q. Did you ever discuss with Mr.	Page 75	1 WILSON 2 Broadway, right? 3 A. Correct. 4 Q. What did he tell you then? 5 A. He told me that people were in 6 my office, and -- including people he 7 didn't recognize, so that -- and he also 8 mentioned that they were moving things 9 around. They were throwing things out. 10 Q. Anything else that he told you? 11 A. He asked me what is going on. 12 Q. Did he identify what people were 13 in your office in this conversation of 14 February 2012? 15 A. I don't recall which people he 16 mentioned, but -- and I am not sure he 17 knew who the people were. 18 Q. Did he identify any things that 19 were thrown out? 20 A. He didn't mention anything 21 specifically. 22 Q. Did you ask him? 23 A. No, I didn't ask him what is 24 being thrown out. No. 25 Q. Did Mr. Guscott ever identify	Page 77

1 WILSON 2 any of the people who were then in your 3 office? 4 A. Well, he -- he said he didn't 5 know some of them. 6 Q. Did he identify any of them? 7 A. He did not. People -- no, he 8 didn't identify them specifically. 9 Q. Did he ever identify anything 10 that had been thrown out? 11 A. Specifically, no. 12 Q. Did he identify generally 13 anything that had been thrown out? 14 A. Papers. 15 Q. Papers. 16 Now, you testified that you have 17 had conversations with Mr. Guscott since 18 February of 2012. In any of these 19 conversations, did he identify any of the 20 people who had been in your office? 21 A. Not to my recollection. 22 Q. In any of these conversations 23 since February of 2012, did Mr. Guscott 24 identify any of the things that had been 25 thrown out?	Page 78	1 WILSON 2 Q. Is it her former husband? 3 A. Yes. 4 Q. Okay. And for Mr. London you 5 say, "Witnessed seizure and destruction of 6 plaintiff's property at 25 Broadway." Do 7 you see? 8 A. Correct. 9 Q. To the best of your knowledge, 10 what information does Mr. London have 11 regarding that subject? 12 A. To the best of my 13 knowledge -- well, first of all, he was an 14 employee at 25 Broadway at the Graduate 15 Center For Worker Education. He also 16 worked at the front desk in the 17 administrative area, and in that -- in 18 those first few months or weeks following 19 the raid and my banning from the 7th 20 floor, he told me at that time that they 21 were taking out boxes from my office 22 and -- yes. 23 Q. Did he identify who was taking 24 out boxes? 25 A. No.	Page 80
1 WILSON 2 A. No. 3 Q. When was the last time you spoke 4 with Mr. Guscott? 5 A. At the beginning of this year, 6 around New Year's. 7 Q. And what was the occasion? 8 A. New Year's greetings and he gave 9 me an update on his graduate work, his 10 master's program. 11 Q. Did he call you or did you call 12 him? 13 A. He called me. 14 Q. Okay, number 4 is Ron London. 15 A. Yes. 16 Q. Do you see that? 17 A. I see that. 18 Q. Is Ron London related to Annie 19 London in any way? 20 A. That's not a yes or no. 21 Q. How is that? Is he related to 22 Annie London? 23 A. At the moment? 24 Q. Yes. 25 A. No.	Page 79	1 WILSON 2 Q. Did you ask him who was taking 3 out boxes? 4 A. No. 5 Q. Did he tell you what was in the 6 boxes? 7 A. He mentioned specifically 8 papers. 9 Q. Do you know what kind of papers 10 he mentioned? 11 A. At that time he said students' 12 papers, my students' papers, master 13 seminar papers. 14 Q. How many boxes -- 15 MR. MARK KLEIN: Withdrawn. 16 Q. Did Mr. London tell you how many 17 boxes were being taken out? 18 A. No. 19 Q. Did you ask him how many boxes 20 were being taken out? 21 A. No. 22 Q. When was the last time you spoke 23 with Mr. London? 24 A. I spoke with Mr. London a couple 25 of weeks ago.	Page 81

<p>1 WILSON 2 Q. What was the occasion? 3 A. I asked him to reconsider and 4 think hard and remember everything that 5 happened because I may want him to be a 6 witness in this case. 7 Q. Did he tell you anything that he 8 recalled about what had happened? 9 A. We didn't discuss the details. 10 He just said he would be willing to be a 11 witness. 12 Q. Now, other than telling you that 13 master seminar papers had been taken, did 14 Mr. London identify anything else that had 15 been taken out of your office? 16 A. No, that -- that I can remember. 17 Q. Now, you testified previously 18 that at a meeting you were informed that 19 you were banned from the Graduate Center 20 For Worker Education, correct? 21 A. Yes. 22 Q. When did this meeting take 23 place? 24 A. That meeting was the last 25 January -- I mean -- I'm sorry. The last</p>	<p>Page 82</p> <p>1 WILSON 2 A. Yes, President Gould. 3 Q. What did she tell you? 4 A. She said I was under 5 investigation. 6 Q. Did she tell you what you were 7 under investigation for? 8 A. No. 9 Q. Did you ask? 10 A. Yes. 11 Q. Did your attorney ask? 12 A. Yes. 13 Q. And what were you told, if 14 anything? 15 A. Nothing. Nothing specific. 16 Q. Were you banned just from the 17 graduate center or also from the Brooklyn 18 College campus? 19 A. I was also banned from the main 20 campus. 21 Q. Do you recall anything that you 22 or your attorney said to the other people 23 who were present at the meeting during 24 this meeting on the last Friday of January 25 2012 in --</p>
<p>1 WILSON 2 Friday of January 2012. 3 Q. Where did this meeting take 4 place? 5 A. On the main campus at Brooklyn 6 College. 7 Q. At whose office, if anyone's? 8 A. It may have been -- it was one 9 of the president's offices, president 10 Karen Gould. 11 Q. And who was present at the 12 meeting? 13 A. Let's see. Pete Zwiebach, 14 Karen Gould, Provost Tramontano, Pam 15 Pollack. I think Michael Hewitt was there. 16 Let's see. I think Dean Phillips was 17 there. Let's see. I think that was 18 about it. 19 Q. And how long after the "Raid" 20 did this meeting take place at President 21 Gould's offices? 22 A. Several days. 23 Q. Did anyone tell you what was 24 going on during this meeting in President 25 Gould's office?</p>	<p>Page 83</p> <p>1 WILSON 2 A. Yes. 3 Q. -- in President Gould's office? 4 A. Yes. 5 Q. What? 6 A. There was a particular issue 7 about plagiarism and -- and there were 8 some other remarks that Dean Phillips was 9 making, and my recollection is that at 10 that meeting Zwiebach admonished Dean 11 Phillips for making the accusations of 12 plagiarism, and -- because he had heard 13 that she had been making these to multiple 14 people, and -- and so I think the -- as I 15 recall, the president noted that, and that 16 was the -- I think that was the main issue 17 that I recall at that time. So my 18 understanding was that this -- there was 19 something going on with plagiarism, so 20 that was -- 21 Q. Was there any description of who 22 was allegedly engaging in plagiarism? 23 A. None. Me. Me. 24 Q. You personally were engaging in 25 plagiarism?</p>

22 (Pages 82 - 85)

<p>1 WILSON 2 A. Yes. 3 Q. Do you recall whether the 4 allegation -- 5 MR. MARK KLEIN: Withdrawn. 6 Q. Did anyone say how you were 7 allegedly engaging in plagiarism? 8 A. Well, I mean when you say 9 anyone, what do you mean by anyone? 10 Q. At this meeting. 11 A. No. At that meeting, no. 12 Q. Now, a few minutes ago you 13 testified that Ron London said that boxes 14 were being removed, and that the boxes 15 contained graduate student papers, right? 16 A. Right. 17 Q. Did Mr. London tell you how he 18 knew that there were graduate student 19 papers in the boxes? 20 A. He didn't tell me how he knew. 21 Q. Did you ask him how he knew? 22 A. No. 23 Q. And he didn't tell you how many 24 boxes were being removed? 25 A. He didn't tell me how many</p>	<p>Page 86</p> <p>1 WILSON 2 are -- we are talking about bound archival 3 records of students' terminal work. 4 Q. Now, did you consider these 5 students papers, these graduate students 6 papers to be your property? 7 A. These would be 8 institution -- well two things -- 9 Q. Answer my question. Did you 10 consider these students -- 11 A. Not personal property. 12 Q. Okay. And the ten or fifteen 13 bound volumes, did you consider -- 14 MR. MARK KLEIN: Withdrawn. 15 Q. These ten or fifteen bound 16 volumes of graduate students papers, did 17 you consider those to be your personal 18 property? 19 A. No. 20 Q. Directing your attention back to 21 Exhibit 1, item 5, you identify Jose 22 Vargas, and it says, "Witnessed the 23 seizure of plaintiff's computer equipment 24 at 25 Broadway." Do you see that? 25 A. Yes. Sorry. Number 5, "former</p>
<p>1 WILSON 2 boxes. 3 Q. And you didn't ask him? 4 A. I didn't need to ask him. 5 Q. Why is that? 6 A. Because we had hundreds of 7 graduate papers, and one could only 8 imagine it would be many boxes. 9 Q. And were these graduate student 10 papers in your office, the office that you 11 have drawn and that has been marked as 12 exhibit 2? 13 A. They were in various areas, 14 including my office. 15 Q. Where were they in your office? 16 A. They would have been in various 17 locations in my office on my desk to 18 review student's work. As I recall, 19 there was a box of student papers in my 20 office. I can't tell you precisely 21 where, but there was a box of student 22 papers, and then on my bookshelf I had a 23 number of the archived papers that I would 24 have used for references, maybe ten or 25 fifteen bound volumes, because these</p>	<p>Page 87</p> <p>1 WILSON 2 employee witness to seizure of plaintiff's 3 computer equipment. Correct. 4 Q. And why do you list Mr. Vargas 5 here? 6 A. Well, Mr. Vargas -- 7 MR. JAMES KLEIN: I think that 8 is a compound question. 9 MR. MARK KLEIN: Okay. Your 10 objection is noted. 11 Q. Can you answer? 12 A. Mr. Vargas was an employee at 13 that time at 25 Broadway, and he was our 14 tech person, tech support. Technician. 15 Q. Did you ever have any 16 conversation with Mr. Vargas regarding the 17 "Seizure of plaintiff's computer equipment 18 at 25 Broadway"?</p> <p>19 A. Yes, I did. 20 Q. When? 21 A. That would have been in February 22 of 2012. 23 Q. Now, what is the computer 24 equipment that was yours that was seized? 25 A. Well, let's -- I would have to</p>

1 WILSON 2 make a distinction. Computer equipment 3 was computer equipment that I was using, 4 but legally it was owned by the City 5 University. So it wasn't personal 6 property, if that is your question. 7 Q. Well, I am asking you if you can 8 identify what the "Plaintiff's computer 9 equipment at 25 Broadway" was. 10 A. There were laptops and an iPad 11 that I used that he told me were seized, 12 and he told me that -- yes. He told me 13 they were seized. 14 Q. The laptop and iPad, was those 15 your personal property? 16 A. They were owned by the 17 university. 18 Q. Okay. When was the last time 19 you spoke with Mr. Vargas? 20 A. Also around New Year's. 21 Q. Of this year? 22 A. Yes. 23 Q. Did you have a New Year's party 24 in which all these people came, and you 25 talked about the case?	Page 90	1 WILSON 2 Q. What told Ms. Charles to 3 confiscate the mail? 4 A. You will have to ask 5 Ms. Charles. 6 Q. Did Ms. Charles ever tell you 7 who told her to confiscate your mail? 8 A. She told me the administration 9 directed her. 10 Q. When did she tell you that? 11 A. She told me that in 2012. 12 Q. When was the last time you spoke 13 with Ms. Charles? 14 A. About a month ago. 15 Q. Did you ask her if she would be 16 a witness in this case? 17 A. Yes -- no, I didn't ask her if 18 she would be a witness. 19 Q. What did you ask her? 20 A. I asked her if she remembered 21 taking my property, seizing my mail, my 22 U.S. mail. 23 Q. And what did she say? 24 A. She remembered. 25 Q. She said yes, I seized your	Page 92
1 WILSON 2 A. I had no New Year's party. 3 Q. Did you contact him about being 4 a witness in this case? 5 A. Yes, I did. 6 Q. What did he tell you? 7 A. He said he would be happy to 8 cooperate to the best of his recollection. 9 Q. And so Mr. Vargas is going to 10 testify about how the computer equipment 11 that was owned by Brooklyn College and 12 that you used was taken? 13 A. Yes. 14 Q. Is he going to testify about 15 anything else? 16 A. I don't know. 17 Q. The next person listed is 18 Madonna Charles? 19 A. Yes. 20 Q. And it says here "She 21 participated in confiscation of 22 plaintiff's mail. Under administrative 23 direction, Charles was told to confiscate 24 Wilson's mail." That is what it says? 25 A. Right.	Page 91	1 WILSON 2 mail? 3 A. No, that is not what she said. 4 Q. What did she say? 5 A. She said she remembered. She 6 was directed to take it. 7 Q. Did she tell you who had 8 directed her to take your mail? 9 A. Not specifically. 10 Q. Did she tell you that she was 11 directed to "Confiscate and take your 12 mail"? 13 A. She didn't use the word 14 confiscate. She used the word take. 15 Q. Did you ask her what was done 16 with the mail that she took? 17 A. I did. 18 Q. What did she tell you? 19 A. She didn't remember. 20 Q. And at no time has Ms. Charles 21 identified who directed her to take your 22 mail; is that right? 23 A. No. Correct. 24 Q. The next person listed is Mina, 25 M-I-N-A, of the PBM cleaning staff; is	Page 93

24 (Pages 90 - 93)

<p>1 WILSON 2 that right? 3 A. Yes. 4 Q. And under her name it says 5 "witness to destruction of plaintiff's 6 property at 25 Broadway." Right? 7 A. Correct. 8 Q. Does Mina presently work at 25 9 Broadway to your knowledge? 10 A. To my knowledge she does. 11 Q. And when was the last time you 12 spoke with her? 13 A. In 2011. 14 Q. How is it that you spoke to her 15 in 2011? 16 A. I would see her on a regular 17 basis at 25 Broadway. 18 Q. So the last time you spoke to 19 her was before the "Raid"? 20 A. Correct. 21 Q. How is it that you believe that 22 Mina has -- 23 MR. MARK KLEIN: Withdrawn. 24 Q. How is it that you believe Mina 25 had "witnessed destruction of plaintiff's</p>	<p>Page 94</p> <p>1 WILSON 2 you that Mina had complained about there 3 being so many papers in the containers 4 that she couldn't throw them out? 5 A. It may have been one of the 6 other cleaning personnel on that floor who 7 I ran into on the way to the 8th floor. 8 I don't remember specifically, but I 9 remember the phenomena of her saying that 10 there were so much volume and weight and 11 such an extensive, you know, tossing of 12 material that to me -- I was, you 13 know -- I focused on that. I was 14 concerned on that, but no, I didn't speak 15 to her directly. 16 Q. Number 8, you identify Pete 17 Zwiebach -- and by the way that is 18 Z-W-I-E-B-E-C-K at least at it is spelled 19 here, right, Dr. Wilson? 20 A. That's what appears here. 21 Q. Is that the correct spelling of 22 his name to your knowledge? 23 A. I'm not positive if that is a 24 correct spelling. 25 Q. You identify Mr. Zwiebach as</p>
<p>1 WILSON 2 property at 25 Broadway"? 3 A. Because in 2012 an 4 administrator, and I don't recall who, 5 told me that -- because I -- I was in that 6 area. I was in the -- I actually was 7 teaching upstairs on the 8th floor. I was 8 banned on the 7th floor, but I was 9 teaching on the 8th floor, and an 10 administrator or one of the cleaning 11 personnel, somebody told me that Mina 12 complained because they were throwing out 13 such a large volume of material from my 14 office and from the administrative offices 15 that she was unable physically to empty 16 the containers, and that's -- that was the 17 gist of my understanding of what she said. 18 Q. Do you know what was in the 19 containers that Mina was unable -- 20 A. Papers. Papers. Papers. 21 Q. Do you know what kind of papers? 22 A. No. 23 Q. Anything else? 24 A. No. 25 Q. And you don't recall who told</p>	<p>Page 95</p> <p>1 WILSON 2 having "witnessed seizure/conversion of 3 mail and property, witness to defamatory 4 criminal charges." Do you see that? 5 A. Yes. 6 Q. What "seizure/conversion of mail 7 and property" did Mr. Zwiebach witness? 8 A. Well -- 9 MR. JAMES KLEIN: I am going to 10 object as to any issue that arises 11 relative to the attorney-client privilege. 12 Certainly he can talk about facts, but 13 anything regarding any legal conclusion or 14 anything related to their attorney-client 15 relationship I am objecting to. 16 MR. MARK KLEIN: I asked him to 17 tell me what seizure/conversion of male 18 and property Mr. Zwiebach witnessed. I 19 am not asking for legal conclusions or 20 communications. I am asking just what I 21 asked. 22 A. So Pete had occasion to view the 23 defamatory charges made in the New York 24 Times and in other venues. 25 Q. All right. Let's take those</p>

25 (Pages 94 - 97)

1 WILSON 2 one at a time. You said that Mr. 3 Zwiebach viewed the property that had been 4 seized? 5 A. Yes. 6 Q. When did he view that property? 7 A. You would have to ask Mr. 8 Zwiebach. 9 Q. Were these on occasions when 10 when Mr. Zwiebach came to Brooklyn College 11 to look at the boxes of your materials 12 that Brooklyn College was storing? 13 A. These were occasions when Mr. 14 Zwiebach looked at the materials in 15 different locations of my materials that 16 Brooklyn College seized. 17 Q. How many different locations did 18 Mr. Zwiebach look at materials? 19 MR. YONG: If you know. 20 MR. JAMES KLEIN: I am going to 21 object. He doesn't know what Mr. 22 Zwiebach looked at. 23 Q. Did Mr. Zwiebach ever tell you 24 what locations he looked at materials? 25 A. I think he mentioned three or	Page 98	1 WILSON 2 been taken from your office? 3 A. So one was in Boylan Hall. 4 Q. And that is on the Brooklyn 5 campus of Brooklyn College; is that right? 6 A. That's correct. That is the 7 name of the building. 8 Q. And where in Boylan Hall did you 9 view materials? 10 A. That would have been on the 11 first floor of Boylan Hall in one of the 12 conference rooms of the Office of Business 13 and Physical Services, as I recall. That 14 would be -- and I mean there is another 15 location that I recall, but -- nearby, 16 but -- so there was -- and Pete was there 17 as well, but that is another location down 18 the hall in Pam Pollack's office on the 19 first floor of Boylan Hall. 20 Q. So you are saying that you and 21 Mr. Zwiebach reviewed documents in two 22 different locations in Boylan Hall, one in 23 Pam Pollack's office and one in the 24 conference room? 25 A. No, that is not what I said. I	Page 100
1 WILSON 2 four different locations. 3 Q. What three or four locations? 4 A. I believe he said CUNY Central, 5 and I believe he said Africana studies. 6 In fact, I am sure he said Africana 7 studies, and I am sure he viewed documents 8 in -- in Boylan Hall. Those are the ones 9 I am aware of. There may have been 10 others. 11 Q. Did you ever accompany Mr. 12 Zwiebach in any of the instances in which 13 he viewed the materials that had been 14 taken from your office? 15 A. Yes, on two occasions as I 16 recall. 17 Q. And what were those two 18 occasions? 19 A. Those -- I don't recall the 20 exact dates if that is your question. 21 Q. Where were the two occasions -- 22 MR. MARK KLEIN: Withdrawn. 23 Q. What were the locations of the 24 two occasions that you accompanied Mr. 25 Zwiebach and reviewed materials that had	Page 99	1 WILSON 2 said we reviewed them in one office, which 3 was in the conference room of Business and 4 Physical Services. We reviewed 5 documents, but we went into Pam Pollack's 6 office, and I viewed -- not reviewed. I 7 saw documents -- my documents, some of my 8 documents in her office. 9 Q. Okay. When did you review 10 documents that were in a conference room 11 in Boylan Hall along with Mr. Zwiebach? 12 A. I think this would have been 13 sometime in 2015 or 2014. 14 Q. And what files did you review at 15 that time? When you went to the conference 16 room in Boylan Hall? 17 A. Those were mainly administrative 18 files. 19 Q. When you say administrative 20 files, what do you mean? 21 A. I mean personnel records, 22 employee documents, some student files, 23 travel files with passport information, 24 and -- information about various programs 25 I was involved in, you know,	Page 101

<p style="text-align: right;">Page 102</p> <p>1 WILSON 2 like the -- like the mail initiative 3 program. There were some files at the 4 Center For Diversity and -- but there were 5 no -- my research wasn't there. My 6 letters weren't there. My lectures 7 weren't there. You know, my -- now, I do 8 remember a camera that was my personal 9 camera being in one of the -- the open 10 boxes that we examined, and the boxes were 11 disheveled. They weren't categorized. 12 Everything was not in an envelope. So it 13 was like chaotic, irregular boxes stacked 14 up, you know, and I don't know how many 15 boxes there were, but they were open, 16 unnumbered, unlabeled, and I do remember a 17 personal camera that I owned was in one of 18 the boxes. And -- 19 Q. You say your lecture notes 20 weren't there, and your research wasn't 21 there? 22 A. No, and my letters weren't 23 there, and -- and my manuscripts weren't 24 there, and in fact my boxes weren't there. 25 Q. And did you say anything to</p>	<p style="text-align: right;">Page 104</p> <p>1 WILSON 2 he had. 3 Q. Do you have any knowledge as to 4 whether Mr. Zwiebach or Mr. Moore 5 complained to anyone about your stuff not 6 being there? 7 A. Yes, Mr. Zwiebach did. 8 Q. And did he do that orally or in 9 writing to your knowledge? 10 A. Both. 11 Q. And who did he do that to? 12 A. I don't know all the people he 13 complained to. 14 MR. JAMES KLEIN: The form of 15 the question is -- 16 Q. Do you know anybody that Mr. 17 Zwiebach complained to about missing 18 stuff? 19 MR. JAMES KLEIN: When you say 20 know, that's -- does he know the person 21 individually? 22 MR. MARK KLEIN: Could you read 23 back the question, please. 24 (Record read.) 25 A. I believe Michael Hewitt. That</p>
<p style="text-align: right;">Page 103</p> <p>1 WILSON 2 anybody about where were your books, 3 manuscripts, lectures and research? 4 A. Absolutely. I said to Pete 5 where is my stuff. Where is my stuff, 6 and he said -- 7 MR. JAMES KLEIN: Don't say it. 8 No. He is your attorney. 9 THE WITNESS: Yes. 10 Q. Did you say anything to anyone 11 besides your attorney besides where is 12 your stuff ? 13 A. To my other attorney at that 14 time. 15 Q. Who was your attorney at that 16 time? 17 A. At that time Collin Moore. 18 Q. Okay. To your knowledge, did 19 either Mr. Zwiebach or Mr. Moore say 20 anything to anybody about where your 21 books, manuscripts, lectures, research and 22 letters were? 23 MR. JAMES KLEIN: I am going to 24 object to that as to any information he 25 has about that based on any conversations</p>	<p style="text-align: right;">Page 105</p> <p>1 WILSON 2 is who I know. And -- and he also 3 mentioned it to Pam Pollack, and I 4 believe -- and I am sure -- well I can't 5 say I am sure. I think he spoke to a 6 Ms. -- 7 MR. JAMES KLEIN: Hold on. If 8 this is -- if any of these are the 9 basis -- you know, based on anything that 10 Mr. Zwiebach told you as your attorney, it 11 is privileged. 12 THE WITNESS: I see. Right. 13 Q. Have you ever seen an e-mail 14 from Mr. Zwiebach to anybody complaining 15 about your books, manuscripts, lecture 16 notes, research or letters being missing? 17 A. I can't recall at this moment. 18 Q. Did you ask Mr. Zwiebach to send 19 such an e-mail? 20 MR. JAMES KLEIN: That is 21 privileged. 22 Q. Did you review these boxes in 23 one of the conference rooms in Boylan Hall 24 in connection with the arbitration in this 25 case that you had with Brooklyn College</p>

27 (Pages 102 - 105)

<p>1 WILSON 2 and CUNY? 3 A. Yes. 4 Q. So you reviewed these materials 5 in preparation for that arbitration; is 6 that right? 7 MR. JAMES KLEIN: I believe 8 that is privileged. 9 MR. MARK KLEIN: I am trying to 10 set in time when this took place. He 11 said it was sometime in 2014. 12 MR. JAMES KLEIN: You are asking 13 for preparations in his legal proceedings. 14 Q. You said it was sometime in 2014 15 or 2015. Could you be any more specific? 16 A. Not at this moment. 17 Q. Now, you also testified that Mr. 18 Zwiebach reviewed materials in Africana 19 studies, correct? 20 A. Correct. 21 Q. That is at James Hall in 22 Brooklyn College at the Brooklyn campus? 23 A. That's correct. 24 Q. Were you present when Mr. 25 Zwiebach reviewed materials in Africana</p>	<p>Page 106</p> <p>1 WILSON 2 summers. That's correct incorrect. 3 Q. But during the school year? 4 A. At various times. 5 Q. All right. Now, at this 6 occasion that you and Mr. Zwiebach went to 7 Africana studies in 2014 or 2015, did you 8 see any of your books, manuscripts, 9 lectures, research, notes or letters? 10 A. No. 11 Q. Who gave you access to these 12 materials in Africana studies? 13 A. As I recall, a Brooklyn College 14 security guard opened the door for us, as 15 I recall. I don't know who, but that is 16 my recollection. 17 Q. Do you have any understanding as 18 to how these materials had gotten to 19 Africana studies in order for you and Mr. 20 Zwiebach to review them? 21 A. Yes, I do. 22 Q. And what is your understanding? 23 A. Let me just think about that for 24 a minute. Actually my understanding -- I 25 don't know exactly how that stuff got</p>
<p>1 WILSON 2 studies? 3 A. On one occasion, yes. 4 Q. And when was that as best you 5 can recall? 6 A. I don't remember the exact date. 7 It would have been probably in 2014 or 8 2015. 9 Q. And what materials did you 10 review in 2014 or 2015 when you and Mr. 11 Zwiebach went to Africana studies? 12 A. These would have been travel 13 records with, you know, student 14 information, correspondence with the 15 travel agency, maybe ticketing 16 information. There may have been -- oh, 17 employee timesheets. There were 18 activities of the various programs, 19 events -- 20 Q. These are all materials in 21 connection with trips you had taken with 22 the Graduate Center For Worker Education 23 students during various summers; is that 24 right? 25 A. That's correct. Not during the</p>	<p>Page 107</p> <p>1 WILSON 2 there, so the answer is no. I don't know 3 exactly how they got there. 4 Q. Were these materials in George 5 Cunningham's office in Africana studies? 6 A. I am not sure whose office it 7 was in at that time. I think it might 8 have been a different office I 9 think or -- but I am not sure which office 10 it was. 11 Q. Is it your testimony you never 12 asked that your materials be put in George 13 Cunningham's office at Africana studies? 14 A. Well, my my testimony is that 15 some of my materials were in Paisley 16 Currah's storage closet for some period of 17 time, and I don't know what was in there, 18 and I was contacted, and I don't remember 19 precisely by whom, but that they wanted 20 move my stuff, and so I -- because of 21 the -- because Paisley had been accusing 22 me of stealing millions of dollars, 23 because Paisley had been accusing me of 24 plagiarism and other things that I was 25 very concerned about them moving my stuff</p>

<p>1 WILSON 2 anywhere because I figured that is just 3 problematic. So -- so I went to observe 4 these things, some of the things that were 5 in Paisley's office in the public -- there 6 is like a public lounge and a storage 7 closet. 8 Q. Okay. 9 A. So -- yes. 10 Q. You referred to Paisley's 11 storage closet, right? 12 A. The department of political 13 science to be more precise. 14 Q. So what you are talking about is 15 a storage closet off the faculty lounge 16 for the department of political science, 17 right? 18 A. That's correct. 19 Q. To your knowledge, is this 20 storage closet locked? 21 A. Yes and no. 22 Q. Are you aware of any time in 23 which it was not locked? 24 A. Of course. 25 Q. While your materials were in</p>	<p>Page 110</p> <p>1 WILSON 2 Q. You don't know? 3 A. I am not sure. 4 Q. If you look at the description 5 on page 3 of Exhibit 1 with regard to Pete 6 Zwiebach, there is a reference to March of 7 2016 there. Do you see that? 8 A. Yes. March of 2016, right. 9 Q. And it doesn't appear to be a 10 complete sentence, but there is a 11 reference to "obtains his property until 12 March of 2016"?</p> <p>13 A. Right. 14 Q. And so you obtained your 15 property in March of 2016? 16 A. I never obtained my property. 17 Q. So what do the words obtains his 18 property until March 2016 mean here? 19 A. So I was terminated in February 20 of 2016, and I wanted to make arrangements 21 to pick up whatever was left over, the 22 remnants, whatever they had. Again, I had 23 no idea what was there, and so it took a 24 couple of months for them even to make 25 arrangements for me to pick up the</p>
<p>1 WILSON 2 there? 3 A. Yes. 4 Q. And how do you know that? 5 A. Well, first because of the 6 pattern and practice that it wasn't just 7 for my materials, but it was to store 8 coffee, tea, sugar, garbage bags. I mean 9 and it was a lounge, and so the practice 10 was that door was open frequently. For 11 years, for decades it was open and closed, 12 open and closed, so that is how I know. 13 So that was the common practice, and on 14 the day that I arrived there to watch my 15 materials being transferred when I arrived 16 the door was open, and not only was the 17 door open but I recognized that one of my 18 computers was outside in the lounge on the 19 floor. 20 Q. When did you come to Brooklyn 21 College to look at the movement of your 22 materials from the storage closet? 23 A. I don't recall the exact date. 24 Q. Do you know what year it was? 25 A. Maybe it was 2014.</p>	<p>Page 111</p> <p>1 WILSON 2 leftovers. 3 Q. Going back to when you and Mr. 4 Zwiebach reviews materials at Africana 5 studies, which you said took place in 2014 6 or 2015, you testified, right, that your 7 books, manuscripts, lectures, research 8 notes, and letters were not present then? 9 A. That's right. 10 MR. JAMES KLEIN: You said they 11 were not present in Boylan Hall. 12 THE WITNESS: In Boylan Hall. 13 Q. Were they also present in 14 Africana studies? 15 A. I never saw them at any time. 16 Q. Did you ask anybody where those 17 materials were? 18 A. Yes, I asked Pete. 19 Q. And to your knowledge, did Mr. 20 Zwiebach complain to anyone or ask where 21 those materials were? 22 A. I asked him to complain. 23 Q. Do you know if he did? 24 A. I think he did, but I don't know 25 for a fact.</p>

<p style="text-align: right;">Page 114</p> <p>1 WILSON 2 Q. So we identified two occasions 3 when you looked at your materials, once at 4 Boylan Hall and once at Africana studies, 5 right? 6 A. Once in Boylan Hall and once in 7 Africana studies. 8 Q. And you also testified that you 9 looked at materials at CUNY central? 10 A. No, I never testified to that. 11 Q. Did Mr. Zwiebach look at 12 materials at CUNY Central? 13 A. That is my understanding. 14 Q. Did you look at any of your 15 materials on any other occasions besides 16 when you went to Africana studies in 2014 17 or 2015 and the time you went to Boylan 18 Hall and looked in a conference room in 19 2014 or 2015? 20 A. I think there were two other 21 occasions that I can recall. One was in 22 2015. It may have been February of 2015, 23 and it was to see if there were additional 24 materials for arbitration, as I recall. 25 Q. Did you accompany Mr. Zwiebach</p>	<p style="text-align: right;">Page 116</p> <p>1 WILSON 2 A. Me personally, no. 3 Q. Do you know if Mr. Zwiebach did? 4 A. I think Mr. Zwiebach did get 5 copies of some administrative files. 6 Q. Do you know of any files that 7 you and Mr. Zwiebach asked to be copied 8 that you didn't -- that he didn't receive? 9 A. In terms of administrative 10 files, I think he -- he got some copies 11 that he asked for. 12 MR. JAMES KLEIN: Objection. He 13 doesn't know. He can't testify to what 14 Mr. Zwiebach got. 15 Q. Did you personally receive 16 copies of any materials that you reviewed? 17 A. Not personally, no. 18 Q. So you testified that there were 19 two other occasions that you went to 20 review materials. Once was at Africana 21 studies by yourself, and what was the 22 other one? 23 A. After my termination, and that 24 would have been in March, April, May of 25 2016.</p>
<p style="text-align: right;">Page 115</p> <p>1 WILSON 2 on that occasion? 3 A. No. 4 Q. You went by yourself? 5 A. He arranged for security to let 6 me in; otherwise, I couldn't have gotten 7 on campus, and then I was met by security, 8 and then there was a security 9 representative who sat in front of the 10 door, who told me I couldn't take 11 anything. 12 Q. Where? In front of the door 13 where? 14 A. This would have been in Africana 15 studies. I think it was in -- Africana 16 studies on the third floor of James Hall. 17 Q. And was this occasion you went 18 to Africana studies by yourself before or 19 after you went to Africana studies with 20 Mr. Zwiebach? 21 A. That -- I am not sure if it was 22 before or after. 23 Q. Did you receive copies of any of 24 the materials that you and Mr. Zwiebach 25 identified as things you wanted copies of?</p>	<p style="text-align: right;">Page 117</p> <p>1 WILSON 2 Q. And what happened then? 3 A. What happened then was I looked 4 for my letters. I found none. I 5 did -- there were books there but not my 6 prized collection. I didn't see my 7 lecture notes, which would have been 8 voluminous. I didn't see my research. 9 So that was my most striking recollection 10 of 2016. 11 Q. Okay. When you went in March, 12 April or May of 2016 as you just 13 described, did you go with Mr. Zwiebach 14 or -- 15 A. No. 16 Q. -- on your own? 17 A. On my own. He arranged it, but 18 I went on my own. 19 Q. Okay. And you didn't see 20 your prized collection of books. You 21 didn't see your lecture notes or your 22 research notes according to what you have 23 testified to; is that right? 24 A. Or my letters. 25 Q. Or your letters. Now, first of</p>

<p style="text-align: right;">Page 118</p> <p>1 WILSON 2 all, you referred previously to 3 administrative files. What do you mean by 4 administrative files? 5 A. Well, I was a program 6 administrator for several programs, and so 7 there are always, you know, voluminous 8 administrative files when you have 9 hundreds of students, so these would have 10 been student records. These would have 11 been affirmative action records, 12 employment -- employee records because I 13 was on numerous search committees 14 including presidential search committees. 15 So if you are an administrator for many, 16 many years, you accumulate many 17 administrative files, activities, events 18 and so forth.</p> <p>19 Q. Did you consider these 20 administrative files to be your personal 21 property?</p> <p>22 A. No, not at all.</p> <p>23 Q. Now, on this occasion in March, 24 April or May of 2016 when you looked for 25 your letters, the prized collection of</p>	<p style="text-align: right;">Page 120</p> <p>1 WILSON 2 Q. And what did she tell you? 3 A. She said she would assist 4 and -- and what she told me initially was 5 yes, I knew you didn't have access, and 6 that was it.</p> <p>7 Q. Other than speaking with 8 Professor Day about whether she saw 9 letters, research notes, your prized book 10 collection, your lecture notes, did you 11 talk to anybody else about where this 12 stuff was?</p> <p>13 A. You mean that day?</p> <p>14 Q. At any time, that day or after 15 about where this stuff was.</p> <p>16 A. Oh. That is all -- those are 17 the only people I can recall at this 18 moment.</p> <p>19 Q. Well --</p> <p>20 A. You know --</p> <p>21 Q. You were concerned, were you 22 not, that all this prized material wasn't 23 there? Yes or no.</p> <p>24 A. Yes, absolutely.</p> <p>25 Q. And did you send an e-mail to</p>
<p style="text-align: right;">Page 119</p> <p>1 WILSON 2 your books, your lecture notes, your 3 research, and your letters -- I said 4 letters twice -- did you say anything to 5 anybody as to where this stuff was?</p> <p>6 A. Yes, actually.</p> <p>7 Q. And who did you say something 8 to?</p> <p>9 A. At that time, I was met by a 10 faculty member who actually gave me access 11 to at that time, and that would have been 12 Professor Day, and I asked Professor Day 13 have you seen my books? Have you seen my 14 letters? Have you seen my lectures. I am 15 looking for my property, and she said I 16 don't know anything about that.</p> <p>17 Q. When was the last time you 18 talked with Professor Day?</p> <p>19 A. Probably weeks ago.</p> <p>20 Q. What were the circumstances 21 under which you spoke with her a week ago?</p> <p>22 A. I wanted to see if she would be 23 willing to be a witness to the seizure of 24 my property and to, you know, keep fresh 25 in her memory what she witnessed.</p>	<p style="text-align: right;">Page 121</p> <p>1 WILSON 2 somebody; did you send a letter to 3 somebody; did you complain to anyone about 4 this missing material?</p> <p>5 A. I -- I told you previously I 6 sent e-mails to Pam Pollack. I 7 complained to my attorney, and he filed a 8 lawsuit over that, you know. That was 9 one of the elements of the lawsuit. So 10 those were -- and the -- let's see. 11 Those would be the main people who I spoke 12 to. That is it.</p> <p>13 Q. So --</p> <p>14 A. Well, I mentioned -- I spoke to 15 Hewitt about it, returning my stuff. I 16 told you I already spoke to Haugstatter, 17 but this was sequential. This was 18 evolving. This isn't like -- so if I 19 mentioned people earlier that I raised it 20 with, that's -- but I won't go back to the 21 same people who violated me and ask them. 22 You know, obviously if they kept it for 23 years what am I going to do, keep hitting 24 my head against the wall.</p> <p>25 Q. Well, until you went to Brooklyn</p>

<p>1 WILSON</p> <p>2 College in March, April or May of 2016, 3 and you are not sure exactly when it was, 4 to get your materials, you didn't know 5 exactly what was missing, did you?</p> <p>6 A. Well, that is not exactly 7 correct.</p> <p>8 Q. Why is that?</p> <p>9 A. That's because when I was there 10 with Mr. Zwiebach, and we had looked in 11 boxes, the issue was where is my letters; 12 where is my notes; where is my research. 13 So I knew that was missing. I didn't 14 know what else was missing, but I 15 certainly knew major things were missing, 16 but no, I didn't have a definitive list at 17 that time. And by the way, I still don't 18 have a completely definitive list.</p> <p>19 Q. And have you seen any 20 communication either from you or your 21 counsel to anyone at CUNY or Brooklyn 22 College asking about where your research 23 notes and your prized book collection and 24 your research and letters were?</p> <p>25 A. I believe I saw an e-mail from</p>	<p>Page 122</p> <p>1 WILSON</p> <p>2 am not positive. I may have seen 3 communication from Mr. Zwiebach asking 4 about my materials. Yes.</p> <p>5 Q. And this communication from Mr. 6 Zwiebach, when did he send that?</p> <p>7 A. Probably it would been in 2013, 8 2014 maybe continuously.</p> <p>9 Q. Let's go to the top of page 4 of 10 Exhibit 1.</p> <p>11 A. I am going to have to take a 12 break.</p> <p>13 MR. MARK KLEIN: Let's go off 14 the record.</p> <p>15 (Luncheon recess: 12:45 p.m.)</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>1 WILSON</p> <p>2 Michael Hewitt. I called him and said 3 Michael, I am not getting my mail. I 4 haven't been getting my mail for years, 5 for months. Where is my mail? And I 6 believe there was an e-mail exchange, and 7 he said he would try to find out.</p> <p>8 Q. So now we are talking about your 9 mail?</p> <p>10 A. Uh-huh.</p> <p>11 Q. I asked you about your research 12 notes, your prized book --</p> <p>13 A. But I asked him about my 14 property.</p> <p>15 Q. Please. We can't talk at the 16 same time.</p> <p>17 A. Okay.</p> <p>18 Q. I asked have you ever seen any 19 written communication from you or your 20 attorney, any of your attorneys to anyone 21 asking where your research notes were, 22 where your prized book collection was, 23 where your manuscripts were, where your 24 letters were, any of that stuff.</p> <p>25 A. I may have seen something, but I</p>	<p>Page 123</p> <p>1 WILSON</p> <p>2 A F T E R N O O N S E S S I O N</p> <p>3 1:30 p.m.</p> <p>4 MR. MARK KLEIN: Back on the 5 record.</p> <p>6 DR. J O S E P H W I L S O N, 7 having been previously duly sworn, 8 testified further as follows:</p> <p>9 CONTINUED EXAMINATION</p> <p>10 BY MARK KLEIN:</p> <p>11 Q. Dr. Wilson, directing your 12 attention to page 4 of Exhibit 1, which is 13 plaintiff's initial disclosures in this 14 case.</p> <p>15 A. Page 4.</p> <p>16 MR. JAMES KLEIN: I apologize.</p> <p>17 Could we go off the record for one minute.</p> <p>18 I left my copy inside.</p> <p>19 THE WITNESS: I may have taken 20 your copy.</p> <p>21 MR. JAMES KLEIN: Okay.</p> <p>22 Q. First off, Dr. Wilson, is there 23 any testimony you gave this morning before 24 we took a lunch break that you would like 25 to change or modify?</p>

<p>1 WILSON 2 A. I would have to hear what I 3 said. 4 Q. Sitting here today, is there any 5 testimony you gave this morning that you 6 would like to change or modify? 7 MR. JAMES KLEIN: Well, at a 8 later date, we will have an opportunity to 9 correct the record. 10 MR. MARK KLEIN: Yes, and I am 11 asking him now if there is any testimony 12 that he would like to change or modify 13 that he gave this morning. 14 A. At a later date I will review it 15 and modify if it if I need to at a later 16 date of. 17 Q. At this moment you can't think 18 of anything? 19 A. At this moment, no. 20 Q. Directing your attention to 21 paragraph 12, there is Barbara Haugstatter 22 listed there, correct? 23 A. I couldn't hear what you said. 24 Q. Number 12 is a listing for 25 persons likely to have knowledge of</p>	<p>Page 126</p> <p>1 WILSON 2 and the storage closet, do you have any 3 knowledge that Ms. Haugstatter took any of 4 your property? 5 A. That she personally took. I 6 don't have knowledge of that. No. 7 Q. Do you have an understanding of 8 what the word conversion means? 9 MR. JAMES KLEIN: Well, that 10 calls for a legal conclusion. 11 A. Yes, I -- 12 Q. It appears here. Do you have 13 an understanding of what the word 14 conversion means? 15 A. My understanding is that that's 16 like when somebody takes something or 17 keeps something from you that is not 18 theirs, and, yes, so I understand it in 19 this context. I am not sure if that is 20 legal, but that is what I understand. 21 Q. Do you have any knowledge that 22 Ms. Haugstatter took any of your property 23 and kept it? 24 A. I have knowledge that she had 25 control over my property and didn't -- for</p>
<p>1 WILSON 2 discoverable facts, and the person that is 3 listed is Barbara Haugstatter, correct? 4 A. That's correct. 5 Q. And it says next to her name 6 "Brooklyn College employee participated in 7 search and seizure and conversion." Do 8 you see that there, sir? 9 A. I see that. 10 Q. What search and seizure did 11 Barbara Haugstatter participate in? 12 A. The -- all of my office 13 materials, my property that was seized at 14 25 Broadway Barbara had access to, and she 15 also had access to the seized property at 16 Brooklyn College. 17 Q. And you say that Barbara had 18 access to your materials because they were 19 in a storage closet; is that right? 20 A. I said that she -- I would say 21 she had access because she had access to 22 my offices, and that is why. In addition 23 to the storage locker. 24 Q. Besides the fact that 25 Ms. Haugstatter had access to your offices</p>	<p>Page 127</p> <p>1 WILSON 2 whatever reason didn't allow me access to 3 it, yes. 4 Q. Do you have any knowledge that 5 Ms. Haugstatter took your property and 6 hasn't returned it? 7 A. Well, Ms. Haugstatter told me 8 that they had my property. She told me 9 we have your stuff. We have your plant. 10 We have your easel, and she would speak to 11 Paisley about my stuff. So that is my 12 knowledge of what she knows. 13 Q. Do you know if Ms. Haugstatter 14 had access to your office at 25 Broadway 15 after the locks were changed? 16 A. That's my understanding. 17 Q. And what is the basis of your 18 understanding? 19 A. Because staff who worked there 20 for a period of time told me that Barbara 21 Haugstatter was situated at 25 Broadway 22 for a period of time in a secretarial 23 capacity. 24 Q. And when was she situated at 25 25 Broadway?</p>

<p style="text-align: right;">Page 130</p> <p>1 WILSON 2 A. I don't know exactly when. 3 Q. All right. The next person 4 listed is Karen Gould, and you are 5 referring to Brooklyn College's former 6 president, correct? 7 A. Correct. 8 Q. And it says with respect to 9 Karen Gould that she "participated in 10 search and seizure" -- let me try that 11 again. I am sorry. That she 12 "participated in search and seizure and 13 conversion." Do you see that? 14 A. I see that. 15 Q. And how did President Gould 16 participate in this search and seizure to 17 your knowledge? 18 MR. JAMES KLEIN: Again, I am 19 going to object. It calls for a legal 20 conclusion. 21 Q. What is the basis for that 22 statement there, sir? 23 A. That she ordered her employees 24 to change locks on my offices and to 25 restrict -- and forbid my access to my</p>	<p style="text-align: right;">Page 132</p> <p>1 WILSON 2 I was a thief, that I was stealing money. 3 Q. And what defamation with Cheng 4 is referred to there? 5 MR. JAMES KLEIN: Any time you 6 refer to a legal term like defamation I 7 have an objection that you are calling for 8 a legal conclusion. 9 MR. MARK KLEIN: This is 10 plaintiff's initial disclosures. 11 MR. JAMES KLEIN: I understand, 12 but I am making a record of it. 13 MR. MARK KLEIN: Fine. 14 Q. What defamation is referred to 15 there? 16 A. So Gould and her staff including 17 Cheng went around telling people I was a 18 thief. 19 Q. Are you aware of any defamatory 20 statement made by Mr. Cheng himself? 21 A. Yes. 22 Q. What statement? 23 A. My understanding is that he told 24 Ivy Rich that I was a thief. 25 Q. And who is Ivy Rich?</p>
<p style="text-align: right;">Page 131</p> <p>1 WILSON 2 property that was under her administrative 3 control. 4 Q. And you've already told us what 5 your understanding of the word conversion 6 is. Are you aware of any facts that 7 President Gould took and failed to return 8 of your property? 9 A. The fact that my property was 10 under her control, that's the main fact. 11 Q. All right. Now, it also says 12 below in the line below her name that she 13 "participated in defamation with Cheng." 14 Do you see that? 15 A. Yes. 16 Q. What defamation are you 17 referring it? 18 MR. JAMES KLEIN: Again, I am 19 going to object. It calls for a legal 20 conclusion. 21 MR. MARK KLEIN: Your objection 22 is noted. 23 Q. What defamation are you 24 referring to? 25 A. Gould told numerous people that</p>	<p style="text-align: right;">Page 133</p> <p>1 WILSON 2 A. Ivy Rich was at that time the 3 leader or director or some position in the 4 labor arts program. 5 Q. And the labor arts program was 6 situated on the 17th -- sorry, on the 7th 7 floor of 25 Broadway? 8 A. When? 9 Q. At any time. 10 A. At that time, no. At this 11 time, yes. 12 Q. That time being when? 13 A. In 2011, early -- in 2012 they 14 were not situated. 15 Q. All right. So Ivy Rich told 16 you that Mr. Cheng said you were a 17 "thief"; is that right? 18 A. No, that's not right. 19 Q. Ivy Rich told somebody that Mr. 20 Cheng said you were a thief? 21 A. Correct. 22 Q. Who did Ivy Rich tell that Mr. 23 Cheng said that? 24 A. She told Steve Leberstein.? 25 Q. And Mr. Leberstein told you that</p>

<p style="text-align: right;">Page 134</p> <p>1 WILSON 2 Ivy Rich told him that Terrence Cheng said 3 you were a thief? 4 A. Exactly. 5 Q. And when did Ivy Rich tell Steve 6 Leberstein that? 7 A. That would have been in early 8 2012. 9 Q. And when did Mr. Leberstein tell 10 you that Ivy Rich had told him that 11 Terrence Cheng said you were a thief? 12 A. Contemporaneously, like the same 13 day that it happened. 14 Q. Early 2012? 15 A. Early 2012. 16 Q. Did Mr. Leberstein tell you at 17 any other time that Terrence Cheng had 18 said in front of Ivy Rich that you were a 19 thief? 20 A. Yes, later in 2012 he told me, 21 and again in 2013 he told me. 22 Q. Now, he told you in 2012 and 23 2013 that Terrence Cheng had said to Ivy 24 Rich in early 2012 that you were a thief? 25 A. He told me in 2012 when it</p>	<p style="text-align: right;">Page 136</p> <p>1 WILSON 2 Q. So based on what Steve 3 Leberstein told you, you were aware of one 4 instance in which Terrence Cheng said you 5 were a thief, right? 6 A. Based on Steve Leberstein, yes. 7 Are you aware of any other instance in 8 which Mr. Cheng allegedly said anything 9 defamatory about you? 10 A. Yes. 11 MR. JAMES KLEIN: Again, I am 12 going -- it calls for a legal conclusion. 13 MR. MARK KLEIN: Your objection 14 is noted. 15 Q. You know what defamation is, 16 right, sir? 17 MR. JAMES KLEIN: I object. 18 It calls for a legal conclusion. You 19 can't ask him what defamation is. 20 Q. What is your understanding of 21 what defamation is? 22 MR. JAMES KLEIN: That calls for 23 a legal conclusion. 24 MR. MARK KLEIN: I am asking for 25 his understanding, Mr. Klein.</p>
<p style="text-align: right;">Page 135</p> <p>1 WILSON 2 happened and then repeated it 3 subsequently. 4 Q. So it only happened once in 5 early 2012? 6 A. I don't know how many times it 7 happened, but he told me that -- that one 8 occasion, but it was a process. Anyhow. 9 Q. I am asking you, sir, to your 10 knowledge and based on what people -- 11 MR. MARK KLEIN: Withdrawn. 12 Q. Were you ever present when 13 Terrence Cheng said you were a thief? 14 A. No. 15 Q. Were you ever present when 16 Terrence Cheng made any defamatory 17 statement about you? 18 A. No. 19 Q. Are you aware of -- 20 MR. MARK KLEIN: Withdrawn. 21 Q. You have testified that Steve 22 Leberstein told you in early 2012 that Ivy 23 Rich had said that Terrence Cheng had said 24 that you were a thief, right? 25 A. Correct.</p>	<p style="text-align: right;">Page 137</p> <p>1 WILSON 2 A. When they lie about you in a way 3 that is harmful. 4 Q. So that is your understanding of 5 defamation, right? 6 A. Yes. 7 Q. Now, other than this instance 8 that you described where Steve Leberstein 9 told you in early 2012 that Ivy Rich had 10 told him that Mr. Cheng had said you were 11 a thief, are you aware of any other 12 instances or anything -- where anybody 13 lied and said something bad about you by 14 Mr. Cheng? 15 A. Yes. 16 Q. When? 17 A. Also in 2012. 18 Q. So another time in 2012? 19 A. Yes, there were, for example -- 20 well, yes. Yes. 21 Q. Okay. How many times in 2012 22 did Mr. Cheng make a defamatory statement 23 about you? 24 A. I don't know the total number. 25 Q. Other than in 2012, are you</p>

<p style="text-align: right;">Page 138</p> <p>1 WILSON 2 aware of any other instances in which Mr. 3 Cheng made a defamatory statement about 4 you? 5 A. Yes. 6 Q. When? 7 A. In 2012. You mean what 8 instance? 9 Q. Other than in 2012 -- 10 A. Beyond 2012. 11 Q. Right. Are you aware of 12 any -- let me ask the question again just 13 so we are clear. 14 Other than in 2012 at any time 15 in 2012 are you aware of any instances in 16 which Mr. Cheng allegedly made a 17 defamatory statement about you? 18 A. No. 19 Q. Now, the next paragraph is 20 number 14 referring to Terrence Cheng, 21 correct? 22 A. Yes. 23 Q. And it says here "Participated 24 in search and seizure and conversion 25 defamation, malice." Do you see that?</p>	<p style="text-align: right;">Page 140</p> <p>1 WILSON 2 Q. Do you know if he authorized the 3 search and seizure of your office? 4 A. I don't know. 5 MR. JAMES KLEIN: I believe 6 that calls for a legal conclusion. 7 Q. Now, you also say he 8 participated in the conversion -- in 9 conversion, correct? 10 A. Correct. 11 Q. Are you aware of any property 12 that Mr. Cheng took of yours and didn't 13 return? 14 A. I am aware that all of my 15 property at 25 Broadway was seized while 16 it was under his administrative control. 17 Q. Are you aware of any property 18 that he personally took and didn't return? 19 A. Not specifically. 20 Q. Now, then it says defamation. 21 We have already -- I have already asked 22 you about that, and you've told me that 23 the only defamation that you are aware of 24 took place in the year 2012; is that 25 right, sir?</p>
<p style="text-align: right;">Page 139</p> <p>1 WILSON 2 A. Yes. 3 Q. Do you have any -- are you aware 4 of any facts supporting an allegation that 5 Mr. Cheng participated in any search and 6 seizure of your property? 7 A. Yes. 8 Q. What is the basis of your 9 knowledge? 10 A. That Terrence Cheng had 11 administrative control over my offices at 12 25 Broadway. 13 Q. What is the basis of that 14 statement? 15 A. Because that was his position in 16 the college and because he frequented the 17 Center For Worker Education after I was 18 removed as director. 19 Q. So when you say here in 20 paragraph 14 on page 4 of Exhibit 1 that 21 Mr. Cheng "Participated in search and 22 seizure", is that based on the fact that 23 he had control over the Graduate Center 24 For Worker Education according to you? 25 A. Yes.</p>	<p style="text-align: right;">Page 141</p> <p>1 WILSON 2 A. That's right. 3 Q. Number 17 is Professor Linda 4 Day. We have talked a little bit about 5 her, right? 6 A. Right. 7 Q. At the time was she chairperson 8 of the department of Africana studies at 9 Brooklyn College? 10 A. At what time? 11 Q. At any time from 2012 to the 12 present. 13 A. Yes. 14 Q. When was she chairperson? 15 A. I don't know the exact dates. 16 Q. Now, it says with regard to 17 Professor Day, "Witnessed ongoing seizure 18 of plaintiff's property on main campus, 19 seizure, storage at Africana studies." Do 20 you see that? 21 A. I see that. 22 Q. To the best of your knowledge, 23 what seizure of your property on the main 24 campus did Professor Day witness? 25 MR. JAMES KLEIN: Again, it</p>

<p>1 WILSON 2 calls for a legal conclusion. 3 Q. You can answer. 4 A. My property was seized and 5 stored in Africana studies, and so 6 she -- because I was banned from campus I 7 had no access to my property. She knew 8 that, and she -- so that was the seizure 9 that she witnessed. 10 Q. Number 18 is Professor George 11 Cunningham, correct? 12 A. Correct. 13 Q. In what department was Professor 14 Cunningham a professor? 15 A. Africana studies. 16 Q. When was the last time you spoke 17 with Professor Cunningham? 18 A. Maybe a couple of weeks ago. 19 Q. Did you talk to him about being 20 a witness in your case? 21 A. Yes, I did. 22 Q. And what did he tell you and 23 what did you tell him about any of the 24 events relating to this case? 25 A. Essentially I said I might want</p>	<p>Page 142</p> <p>1 WILSON 2 to any defamation by Terrence Cheng? 3 A. I don't know. 4 Q. Number 20 is Steve Leberstein, 5 correct? 6 A. Correct. 7 Q. At the bottom of page 4? 8 A. That's correct. 9 Q. Now, you testified that Mr. 10 Leberstein told you what Ivy Rich had told 11 him about what Terrence Cheng supposedly 12 had said about you, right? 13 A. That's correct. 14 Q. And that was in early 2012, 15 right? 16 A. Correct. 17 Q. Are you aware of any other 18 "defamation" that he witnessed? 19 A. At that time in 2012, he 20 mentioned that he had a meeting or several 21 meetings with Terrence Cheng. 22 Q. And that was in 2012? 23 A. 2012 I believe maybe. Possibly 24 2013. 25 Q. What did he tell you Mr. Cheng</p>
<p>1 WILSON 2 him as a witness to the seizure of my 3 property, and he agreed. 4 Q. And do you know what seizure of 5 your property he witnessed? 6 MR. JAMES KLEIN: Again, it 7 calls for a legal conclusion. 8 Q. You can answer. 9 A. He witnessed that my property 10 was in Africana studies. 11 Q. Did he have any role in getting 12 your property into Africana studies? 13 A. To my knowledge, he allowed 14 property -- the college wanted to move the 15 property, and he allowed the property to 16 be taken to Africana studies. 17 Q. Did you ever tell anyone at 18 Brooklyn College you wanted your property 19 moved to Africana studies? 20 A. I don't recall that. 21 Q. Now, it also says with regard to 22 Professor Cunningham that he was a witness 23 to defamation, correct? 24 A. Yes. 25 Q. Do you know if he was a witness</p>	<p>Page 143</p> <p>1 WILSON 2 said during these meetings in 2012 and 3 2013? 4 A. After one of the meetings, he 5 called me to describe the meeting that he 6 had with Terrence Cheng. 7 Q. And what did he tell you Mr. 8 Cheng had said, if anything? 9 A. What he said was that Terrence 10 Cheng basically said he was coming in to 11 clean up the criminal stuff at the 12 Graduate Center For Worker Education. 13 Q. That is what Mr. Leberstein told 14 you? 15 A. That is what he told me at that 16 time, yes. 17 Q. And what Mr. Leberstein told you 18 was about meetings that took place in 2012 19 or 2013, right? 20 A. Right. 21 Q. Did Mr. Leberstein ever tell you 22 about any meetings that took place after 23 2013? 24 A. No. 25 Q. Okay. If you go to the top of</p>

37 (Pages 142 - 145)

<p style="text-align: right;">Page 146</p> <p>1 WILSON 2 page 5, Number 21, Professor Robert 3 Cherry. 4 A. Yes. 5 Q. And you list him as a defamation 6 witness, correct? 7 A. Correct. 8 Q. And then it says "President 9 Gould's husband told him that Gould had no 10 evidence of plaintiff's criminal acts but 11 would go after plaintiff on "Technical 12 ground rules." 13 A. That's correct. 14 Q. Is that the -- is that the 15 defamatory statement to which Professor 16 Cherry was a witness? 17 MR. JAMES KLEIN: Calls for a 18 legal conclusion. 19 MR. MARK KLEIN: Again, you 20 interrupted my question. If you can 21 wait, then you can make your silly 22 objection. 23 Q. Is that the alleged defamatory 24 statement to which Professor cherry is a 25 witness?</p>	<p style="text-align: right;">Page 148</p> <p>1 WILSON 2 details. Well, I am not totally sure, 3 but I think he told Immanuel Ness, another 4 professor, that Gould told him that 5 basically you shouldn't associate with 6 criminals, and, you know, I was a 7 criminal, and then there was also by 8 implication that Ness -- I don't remember 9 all the details, but that was -- yes, that 10 was the sort of -- what I remember. 11 Q. And to the best of your 12 knowledge, when President Gould's husband 13 tell Professor Cherry this? 14 A. To the best of my knowledge that 15 would have been in 2012. 16 Q. Number 22 is Professor Immanuel 17 Ness, correct? 18 A. Yes. 19 Q. And according to this "he 20 witnessed defamation". Did you see that? 21 A. Yes. 22 Q. Do you know when Professor Ness 23 witnessed defamation? 24 A. In 2011 and 2012. 25 Q. Do you see number 23 Max Azoula?</p>
<p style="text-align: right;">Page 147</p> <p>1 WILSON 2 MR. JAMES KLEIN: Are you done 3 with your question now? 4 MR. MARK KLEIN: Yes. 5 MR. JAMES KLEIN: It calls for 6 a legal conclusion. 7 MR. MARK KLEIN: Thank you. 8 Q. You can answer. 9 A. That is what he told me. 10 Q. Are you aware of any other 11 defamatory statements to which Professor 12 Cherry was a witness? 13 MR. JAMES KLEIN: Are you done 14 with your question now? It calls for a 15 legal conclusion. 16 MR. MARK KLEIN: Do you want me 17 to get the judge on the phone? 18 MR. JAMES KLEIN: Two people can 19 be unprofessional. 20 Q. Are you aware of any other 21 defamatory statements to which Professor 22 Cherry was a witness? 23 A. Yes. 24 Q. What? 25 A. I am trying to recall the</p>	<p style="text-align: right;">Page 149</p> <p>1 WILSON 2 A. Yes. 3 Q. And according to the list here 4 he was "told by Cheng's staff, Phillips, 5 "Wilson was a thief." Do you see that? 6 A. Yes, I see that. 7 Q. Who is Cheng's staff? 8 A. Phillips. 9 Q. So you are saying Dean Phillips 10 was on Terrence Cheng's staff? 11 A. Dean Phillips reported to 12 Terrence Cheng, yes. 13 Q. Okay. To your knowledge did 14 Mr. Azoula -- 15 MR. MARK KLEIN: Withdrawn. 16 Q. To your knowledge, did Terrence 17 Cheng tell Max Azoula that you were a 18 thief? 19 A. I don't know. 20 Q. Number 24 refers to Jose Ohyan, 21 O-H-Y-A-N. Do you see that? 22 A. I see that. 23 Q. And it also says, "Told by 24 Cheng's staff, Phillips, Wilson was 25 stealing." Do you see that?</p>

<p style="text-align: right;">Page 150</p> <p>1 WILSON 2 A. I see that. 3 Q. To your knowledge, did Terrence 4 Cheng tell Mr. Ohyan directly that you 5 were stealing? 6 A. I don't know. 7 Q. Number 25 is an entry for 8 Professor Emeritus Nancy Romer, correct? 9 A. Correct. 10 Q. And in the entry with respect to 11 her it refers to "Cheng's team admin." 12 Do you see that? 13 A. Yes. 14 Q. Now, do you know who is referred 15 to there? 16 A. No, not specifically. 17 Q. Do you know what a team's admin 18 is? 19 A. People who work with an 20 administrator. 21 Q. Okay. To your knowledge, was 22 Nancy Romer told by Mr. Cheng directly any 23 defamatory allegation regarding you? 24 A. I don't know. 25 Q. Number 26 refers to Jumaane</p>	<p style="text-align: right;">Page 152</p> <p>1 WILSON 2 A. Ms. Gaskins is a former student 3 at the graduate center. 4 Q. And she is now in Atlanta, 5 Georgia? 6 A. Correct. 7 Q. When was the last time you spoke 8 with her? 9 A. A couple of weeks ago. 10 Q. Did you ask her if she would be 11 a witness for you? 12 A. Yes, I did. 13 Q. Now, did you talk with her about 14 what she was going to testify about? 15 A. I asked her if she remembered 16 defamatory statements she made 17 about -- yes, Cheng. 18 Q. You asked her whether she 19 remembered Terrence Cheng making 20 defamatory statements; is that right? 21 A. About me. 22 Q. And what did she say? 23 A. She would have to think about 24 it. 25 Q. It says here "Witnessed Cheng's</p>
<p style="text-align: right;">Page 151</p> <p>1 WILSON 2 Williams, correct? 3 A. Correct. 4 Q. Do you know whether Mr. Williams 5 was told by Terrence Cheng that you were a 6 thief? 7 A. I don't know. 8 Q. In the second line it says, "Was 9 told by NY Times defamation in advance." 10 Do you see that? 11 A. Yes. 12 Q. What do you mean by that? 13 A. Council Member Williams told me 14 in advance of the appearance of the New 15 York Times article that Gould told him 16 that an article was going to come out 17 about me. 18 Q. In the New York Times? 19 A. He didn't say specifically, but 20 he said there is going to be an article, a 21 big article coming out about me. 22 Q. Okay. Number 27 is an entry 23 for Erica Gaskins, correct? 24 A. Correct. 25 Q. And who is Ms. Gaskins?</p>	<p style="text-align: right;">Page 153</p> <p>1 WILSON 2 defamatory statements," right? 3 A. Well, I will clarify. At that 4 time in 2012 I spoke to her, and she told 5 me that she was in several meetings with 6 Terrence Cheng, and at that time in 2012 7 she told me that Terrence Cheng 8 criminalized the program, criminalized the 9 students, and criminalized the leadership 10 of the program, and so at that time she 11 told me she felt like she was a criminal 12 and that everybody associated with the 13 program was a criminal. That is what she 14 told me at that time, but this was years 15 back. 16 Q. And that was in 2012? 17 A. 2012. 18 Q. When did -- 19 MR. MARK KLEIN: Withdrawn. 20 Q. How long was Ms. Gaskins a 21 student at the graduate center? 22 A. I don't know. 23 Q. Do you know when she stopped 24 being a student? 25 A. I don't know.</p>

<p style="text-align: right;">Page 154</p> <p>1 WILSON 2 Q. But whatever information you 3 have about what she observed or saw 4 relates to 2012, right? 5 A. That is right. 6 Q. If you go to the next page, page 7 6, number 31 the entry for Penny Lewis, 8 and it says "with regard to her repeated 9 defamation." Do you see that? 10 A. Yes. 11 Q. What defamation are you 12 referring to? 13 A. Specifically that I was a thief. 14 Q. And when did she "repeat this 15 defamation"? 16 A. That would have been in about 17 2013. 18 Q. And why do you believe it was in 19 2013? 20 A. Because I remember it was 21 sometime after this whole thing started, 22 so it wasn't in 2012, but it would have 23 been in 2013 or '14. It would have been 24 even later. 25 Q. So you are saying that Penny</p>	<p style="text-align: right;">Page 156</p> <p>1 WILSON 2 about my criminal behavior, my criminal -- 3 my stealing and things of that sort. 4 Q. And who interviewed him? 5 A. I don't know. 6 Q. Have you spoken to -- when was 7 the last time you spoke to Mr. Kareem? 8 A. Maybe in -- maybe in 2014. 9 Q. I direct your attention to -- 10 did Professor Kareem use the word 11 criminal? 12 A. Yes, stealing and criminal. 13 Yes. 14 Q. And did he tell you who had used 15 those words, if anyone? 16 A. He said the people who 17 interviewed him. 18 Q. And he didn't tell you who 19 interviewed him? 20 A. No, he may have, but I don't 21 recall. 22 Q. And this was in 2013, right? 23 A. Well, the view was I think in 24 2012, but -- 2012, 2013. I don't 25 remember precisely.</p>
<p style="text-align: right;">Page 155</p> <p>1 WILSON 2 Lewis repeated somebody else's defamatory 3 statement? 4 A. Yes. 5 Q. And do you know whose defamatory 6 statement she repeated? 7 A. I don't know where she got her 8 information. 9 Q. Okay. I direct your attention 10 to paragraph 33, Professor Haroon Kareem. 11 Did I pronounce his name right? 12 A. Kareem. 13 Q. Kareem. Thank you. That's 14 K-A-R-E-E-A-M. That is how you spell it? 15 A. I believe so. 16 Q. Now, according to this entry it 17 says he "witnessed defamatory statements". 18 Do you see that? 19 A. I see that. 20 Q. What defamatory statements are 21 you referring to? 22 A. In 2012 after he had been 23 interviewed, and I am not sure by who, he 24 told me that he was told that for him to 25 come, you know, to confess -- to speak up</p>	<p style="text-align: right;">Page 157</p> <p>1 WILSON 2 Q. Okay. Directing your attention 3 to the top of page 7. Page 7. 4 A. Yes. 5 Q. You have an entry 41 for Steve 6 Brier, B-R-I-E-R. 7 A. Yes. 8 Q. With regard to him it says, 9 "Witnessed attempted intimidation by Cheng 10 team, Phillips," right? 11 A. Yes. 12 Q. When was the last time you spoke 13 with Mr. Brier? 14 A. Maybe 2016. 15 Q. Who is the Cheng team that is 16 referred to here? 17 A. Phillips. 18 Q. Okay. Have you talked to Mr. 19 Brier about being a witness in this case? 20 A. No. 21 Q. The next entry is for Funke 22 Okome. Did I pronounce his name right? 23 A. Her name. Okome. 24 Q. F-U-N-K-E capital O-K-E-M-E, 25 right?</p>

<p style="text-align: right;">Page 158</p> <p>1 WILSON 2 A. Right. 3 Q. When is the last time you spoke 4 with Professor Okome? 5 A. Maybe in 2013 6 or -- approximately. 7 Q. All right. 8 A. 2014 maybe. 9 Q. It says here "Aware of hostile 10 acts around false plagiarism charges, 11 defamation cause, loss of collaboration 12 and research publishing consulting causing 13 economic damage." Do you see that? 14 A. I see that. 15 Q. And what defamation is referred 16 to there, if any? 17 A. So Professor Wilson told me that 18 Currah -- 19 Q. You're professor Wilson. 20 A. I'm sorry. Professor Okome 21 told me. I might have to have a break in 22 a minute. 23 Professor Okome told me that 24 Currah and Robin stated that Professor 25 Wilson or me was guilty of plagiarism and</p>	<p style="text-align: right;">Page 160</p> <p>1 WILSON 2 Esq. foundation director. 3 A. Yes. 4 Q. Do you see that? 5 A. Yes. 6 Q. Is Mr. Addams one of your 7 experts in this case now? 8 A. Mr. Addams is an expert. 9 Q. He is one of your experts in 10 this case? 11 A. He is one of my experts in this 12 case. 13 Q. Okay. It says under his name 14 "Found plaintiff unemployable." Do you see 15 that? 16 A. Correct. 17 Q. When did Mr. Addams find you 18 unemployable? 19 A. This was after the appearance of 20 the New York Times article. I believe 21 that was in 2012 or 2013. 22 Q. So after the New York Times 23 article came out, Mr. Addams told you that 24 you were unemployable? 25 A. That it would be difficult to</p>
<p style="text-align: right;">Page 159</p> <p>1 WILSON 2 would have been accused of plagiarism, and 3 that -- I didn't get the details, but that 4 she was asked by Currah and Robin I 5 believe to be on a plagiarism review 6 committee of my students' papers that had 7 been seized. And so that was -- that was 8 the issue of plagiarism where she 9 was -- either she was on the committee or 10 she told me that a committee, ad hoc 11 committee had been formed to review my 12 students' work that had been seized from 13 my office. 14 Q. And when did Professor Okome 15 tell you that? 16 A. At the time that this happened. 17 Q. When was that? 18 A. That would have been in 2012, 19 early 2012, and I am just trying to think 20 if it -- it may have also started in 2011. 21 Actually upon reflection I think -- I 22 think it started in the fall of 2011 and 23 carried over. 24 Q. All right. I direct your 25 attention to paragraph 44, David Addams,</p>	<p style="text-align: right;">Page 161</p> <p>1 WILSON 2 employ me. Correct. 3 Q. Did you ask him for a job? 4 A. I said if there are any 5 positions available I am -- I am 6 available. Yes. 7 Q. Any positions in what? 8 A. In the organization that he 9 was -- he was working at a foundation I 10 believe at that time. 11 Q. What foundation was that? 12 A. I don't recall the name. 13 Q. Is he still with that 14 foundation? 15 A. I don't know if it is the same 16 foundation, but he is at a foundation. 17 Q. So at the time of the New York 18 Times article -- 19 MR. MARK KLEIN: Withdrawn. 20 Q. Had you spoken about employment 21 with Mr. Addams before or after the New 22 York Times article? 23 A. Not before. 24 Q. You spoke to him afterwards? 25 A. Well, I -- no, I spoke to him</p>

<p>1 WILSON 2 about other opportunities probably 3 starting in maybe right even around the 4 same time, right around the time -- 5 Q. The time of the New York Times 6 article? 7 A. Yes. 8 Q. And to the best of your 9 recollection, when was the -- when did the 10 New York times article come out? 11 A. Maybe 2013. I'm not sure of 12 the exact date. 13 MR. MARK KLEIN: I ask that the 14 reporter mark as Wilson 3 a reprint of an 15 article from the New York Times. 16 (Wilson Exhibit 3 marked for 17 identification.) 18 (Document handed to witness.) 19 Q. Dr. Wilson, I show you what has 20 been marked as Wilson Exhibit 3. Please 21 take a moment to generally review it and 22 tell me when you have done so. 23 A. Okay. 24 Q. Is this the article you were 25 referring to, sir?</p>	<p>Page 162</p> <p>1 WILSON 2 A. And beyond. I mean this is -- 3 this was from 2018 it says on the top 4 here. It doesn't say it is from 2014. 5 Q. No, 2018 is when I printed it. 6 A. Right. From where? 7 Q. Online. 8 A. Right. So what I am telling you 9 is online is not necessarily the same as 10 what occurred in print that day. 11 Q. Okay. When did you first speak 12 with Mr. Addams about employment 13 opportunities? 14 A. Right around the time of this 15 article coming out. 16 Q. And when was the last time you 17 spoke to Mr. Addams regarding employment 18 opportunities? 19 A. Maybe a few months ago. 20 Q. And what did you say to Mr. 21 Addams about employment opportunities a 22 few months ago? 23 A. I said I was still interested in 24 employment opportunities, and Mr. Addams 25 said, you know, because of the articles</p>
<p>1 WILSON 2 A. It may or may not be. I'm not 3 sure. 4 Q. So you think there might have 5 been more than one New York Times article? 6 A. Yes. 7 Q. According to this exhibit, this 8 article is published on January 12, 2014; 9 is that right? 10 A. That is according to this, 11 correct, January 14. 12 Q. And you're not sure if this is 13 the article that Jumaane Williams had told 14 you was going to be coming out; is that 15 right? 16 A. New York Times published 17 different versions of their article, so I 18 don't know if this is the original 19 version. 20 Q. Do you think there might have 21 been an article in the New York Times that 22 you have in mind that came out in 2013? 23 A. I think there may have been 24 versions of this article. 25 Q. In 2013?</p>	<p>Page 163</p> <p>1 WILSON 2 and so forth that it would be difficult 3 for me to get a job. 4 Q. Does Mr. Addams know that you 5 were terminated by CUNY? 6 MR. JAMES KLEIN: It calls for 7 speculation. He can't testify -- 8 Q. To your knowledge, do you know 9 if Mr. Addams knows that you were 10 terminated by CUNY? 11 A. To my knowledge, he knows he was 12 terminated by CUNY. 13 Q. And to your knowledge, does Mr. 14 Addams know that a neutral arbitrator 15 upheld your termination? 16 A. I don't know about that. 17 Q. You haven't told him; is that 18 right? 19 A. I didn't mention that, no. 20 Q. Number 45, could you pronounce 21 the name of that person for me? 22 A. Page 45. 23 Q. No, I'm sorry. Going back to 24 Exhibit 1. 25 MR. JAMES KLEIN: Paragraph 45.</p>

42 (Pages 162 - 165)

<p>1 WILSON 2 Q. Paragraph 45. 3 A. Number 45. 4 Q. Yes. 5 A. What was your question? 6 Q. Could you pronounce that 7 person's name for me? 8 A. Kyung Ji Ree, and it is actually 9 Kyung Ji Kate Ree. 10 Q. And who was Ms. Ree? 11 A. Ms. Ree was one of the leaders 12 in -- in a Brooklyn organization called 13 New Leadership. 14 Q. Now, there is a reference under 15 Ms. Ree's name "Search and seizure at 16 Medgar Evers." Do you see that? 17 A. I see that. 18 Q. Is that a typo? 19 A. Is what a typo? 20 Q. Well, was there a search and 21 seizure at Medgar Evers? 22 A. Yes. 23 Q. And how did it relate to you, if 24 at all? 25 A. Her offices were raided. She</p>	<p>Page 166</p> <p>1 WILSON 2 administration referred to is there? 3 A. At that time, this is in 2012 I 4 spoke with him by phone, and he told me he 5 met with a group of Brooklyn College 6 administrators and -- who said that I had 7 been stealing. 8 Q. And that was in 2012? 9 A. In 2012. 10 Q. Have you spoken to Mr. Marcado 11 about being a witness in this case? 12 A. No. Actually I did speak to 13 him about being a witness a number of 14 months ago. 15 Q. What did he say? 16 A. He said he doesn't remember that 17 much about that time. 18 Q. Okay. That time being 2012, 19 right? 20 A. 2012. 21 Q. The next entry is number 47 22 Ronald Mason, Esquire? 23 A. Right. 24 Q. It says, "Witness to economic 25 damage and nonemployability because of</p>
<p>1 WILSON 2 had an office at Medgar Evers. Her 3 office was raided by CUNY. Her computers 4 and documents were seized. 5 Q. And did that have something to 6 do with you? 7 A. Subsequent to that raid she 8 contacted me and asked me to assist at 9 worker education in her organization. 10 Q. When were her offices at Medgar 11 Evers raided according to you? 12 A. I don't know the exact date. 13 Q. What year? 14 A. I don't know the year. 15 Q. Was it before or after January 16 of 2012? 17 A. Before. 18 Q. Number 46 refers to Dean Juan 19 Marcado. Do you see that, sir? 20 A. I see it. 21 Q. It says "Told by BC 22 administration, Isaacson, Wilson was 23 stealing." Do you see that? 24 A. Right. 25 Q. Do you know who the BC</p>	<p>Page 167</p> <p>1 WILSON 2 defamation deterrent to teaching, 3 consulting positions." Do you see that? 4 A. Right. 5 Q. When was the last time you spoke 6 with Ronald Mason? 7 A. Maybe a year or so ago. 8 Q. And have you spoken to Mr. Mason 9 about employment opportunities? 10 A. Yes, I did. 11 Q. When? 12 A. A year or so or two years ago. 13 One or two years. 14 Q. And what did Mr. Mason tell you? 15 A. Well, not only teaching 16 opportunities but other opportunities, and 17 then a number of months later I spoke to 18 him, and he told me he Googled me and saw 19 the New York Times article. 20 Q. And? 21 A. And since that time he hasn't 22 followed up with any opportunities that I 23 think were initially available. 24 Q. Number 49 at the bottom of page 25 7, Bob Hennelly, H-E-N-N-E-L-L-Y, right?</p>

<p style="text-align: right;">Page 170</p> <p>1 WILSON 2 A. That may be misspelled, but yes. 3 Q. At the top of page 8 it says 4 "Wouldn't use plaintiff's quote for 5 publication because of defamatory 6 publications." Do you see that? 7 A. Yes. 8 Q. Do you have an understanding of 9 what that means? 10 A. I can only tell you what he said 11 to me. 12 Q. What did he say to you? 13 A. He asked me for a quote for the 14 newspaper, which I provided. He said it 15 is a great quote, and then he called me 16 back and said unfortunately my managing 17 editor will not allow us to use your quote 18 because of the New York Times article. 19 Q. And when did you have this 20 conversation with Mr. Hennelly? 21 A. In 2019. 22 Q. When did you give him the quote? 23 A. They have gave him -- oh, in 24 2019. 25 Q. Okay. And number 51, Robin</p>	<p style="text-align: right;">Page 172</p> <p>1 WILSON 2 A. He didn't -- he didn't mention 3 much at that time. He said okay or -- 4 Q. Has he ever gotten back to you 5 about employment opportunities? 6 A. No. 7 Q. Did he tell you that he was 8 unable to assist you with academic 9 appointments and referrals? 10 A. No. 11 Q. Number 53, Bill Henning, 12 H-E-N-N-I-N-G, it says "Repeated 13 defamatory remarks." Do you see that? 14 A. Yes. 15 Q. And what defamatory remarks did 16 he repeat? 17 A. That I was a thief. 18 Q. When did he repeat that? 19 A. That would have been in 2013, 20 2014. 21 Q. Did he tell you whose defamatory 22 remarks he was repeating? 23 A. Well, it was based on the New 24 York Times article, so I guess it would 25 be closer to 2014 that he repeated it.</p>
<p style="text-align: right;">Page 171</p> <p>1 WILSON 2 Kelly, Mr. Kelly or Professor Kelly is one 3 of your expert witnesses in this case, 4 correct? 5 A. That's correct. 6 Q. Did you seek employment 7 opportunities with Mr. Kelly? 8 A. I mentioned -- I saw him at a 9 conference, which he may not even recall. 10 He was a panelist, and I mentioned I was 11 looking for work. 12 Q. When was this? 13 A. That conference was probably in 14 like 2018. About 2018 I believe. 2017, 15 2018. Maybe 2017. 16 Q. So 2017 or 2018? 17 A. Uh-huh. 18 Q. That is a yes? 19 A. Yes. 20 Q. So you -- 21 A. Approximately. 22 Q. You told Dr. Kelly that you were 23 looking for work? 24 A. I just mentioned it, yes. 25 Q. What did he say, if anything?</p>	<p style="text-align: right;">Page 173</p> <p>1 WILSON 2 Q. Okay. So who did he repeat 3 these defamatory remarks to? 4 A. Numerous people but among them 5 would have been Don Tuminaro. 6 Q. And he was repeating defamatory 7 remarks that he saw in the New York Times 8 article, correct? 9 A. Yes, and I am not sure what 10 other sources, but that was at least one 11 of the sources. 12 Q. All right. Number 55 there is 13 an entry for Juan Gonzalez, correct? 14 A. Correct. 15 Q. And it refers to a "Loss of 16 research grant for labor broadcast 17 project." Do you see that? 18 A. I see that. 19 Q. Was that a grant that you had 20 personally? 21 A. Not a personal grant. A project 22 grant that I was working on with him. 23 Q. Where? 24 A. Well, at that time I was at 25 Brooklyn College.</p>

<p style="text-align: right;">Page 174</p> <p>1 WILSON 2 Q. So when did you lose this 3 research grant? 4 A. That would have been in 2012. 5 Q. And what grant was that? 6 A. It was a -- it was a grant to 7 develop -- we were securing a grant -- 8 actually I think we had a grant commitment 9 to develop a proposal for a labor 10 broadcast project. 11 Q. And this was a grant that you 12 were applying for in 2012 and didn't get; 13 is that right? 14 A. Correct. 15 Q. Number 56 is an entry from 16 Professor Emeritus Don Watkins, correct? 17 A. Correct. 18 Q. Is Professor Watkins alive? 19 A. No. 20 Q. Number 58, James Murray? 21 A. Yes. 22 Q. There is a reference to 23 "knowledge regarding collection and 24 historical value of plaintiff's archival 25 work and collections." Do you see that?</p>	<p style="text-align: right;">Page 176</p> <p>1 WILSON 2 A. Page 11. 3 A. Okay. 4 Q. Now, am I correct is that a 5 date, June 3, 2018? 6 A. 6/3/18. Yes. I believe so. 7 Q. What is the significance, if 8 any, of that date? 9 A. That was probably the date that 10 this was drafted. 11 Q. Okay. You have a heading 12 "Books" under there, correct? 13 A. Yes. 14 Q. And then you list International 15 Encyclopedia of Revolution and Protest 16 eight volumes. 17 A. Yes. 18 Q. And you place a value of \$1,790 19 on it? 20 A. Correct. 21 Q. Where in your office or offices 22 were these books located? 23 A. That was in my office at the 24 Graduate Center For Worker Education. 25 Q. So that was in the area of the</p>
<p style="text-align: right;">Page 175</p> <p>1 WILSON 2 A. I see that. 3 Q. When was the last time you spoke 4 with Mr. Murray? 5 A. Sometime in 2018. 6 Q. Have you asked Mr. Murray to be 7 a witness in this case? 8 A. Yes. 9 Q. Has he agreed to be a witness? 10 A. No. 11 Q. Did he tell you why not? 12 A. Yes. 13 Q. What did he tell you? 14 A. Because he signed nondisclosure 15 papers with the New York Public Library, 16 and he wouldn't be able to go into details 17 about his work or my collection. 18 Q. Okay. I would like to direct 19 your attention to page 11 of Exhibit 1, 20 "The value of damaged documents and 21 properties by category, Professor Wilson," 22 and then you have a date 6/3/18. Do you 23 see that, sir? 24 A. Not yet. Where is that? 25 Q. Page 11.</p>	<p style="text-align: right;">Page 177</p> <p>1 WILSON 2 special books that you wrote on Exhibit 2? 3 A. Yes. 4 Q. How did you arrive at that time 5 value? 6 A. It is market value. 7 Q. And how did you determine that 8 that was the market value? 9 A. Amazon. 10 Q. Okay. Now, how big were these 11 books? 12 A. Regular books like this. I 13 don't know the exact dimension. 14 Q. Well, how many pages was in each 15 volume approximately? 16 A. Approximately 300. 17 Q. So there were eight volumes of 18 approximately 300 pages each? 19 A. That's correct. 20 Q. Under that you have 21 "approximately 50 signed publications 22 acquired from authors, public lectures," 23 et cetera. Do you see that, sir? 24 A. Yes. 25 Q. Where were these books located?</p>

<p>1 WILSON 2 A. Also in this bookshelf. 3 Q. The same bookshelf where you 4 marked special books on Exhibit 2, right? 5 A. Correct. 6 Q. And there were 50 of them, 7 right? 8 A. Approximately. 9 Q. Approximately 50. 10 And you ascribe a value of \$200 11 per volume for a total of \$10,000; is that 12 right? 13 A. That's correct. 14 Q. How did you arrive at that 15 value? 16 A. By looking on Amazon for the 17 value of signed copies, so that was an 18 approximate value for some of 19 these -- some of these. 20 Q. Well, you have I see twelve 21 names here, correct? 22 A. Correct. 23 Q. Did these 12 people write all 50 24 books that you are referring to here? 25 A. No. Some of them wrote multiple</p>	<p>Page 178</p> <p>1 WILSON 2 Q. All right. 3 A. In a vertical filing cabinet. 4 Q. So with reference to Exhibit 2, 5 which is your drawing of your office at 25 6 Broadway, where was this filing cabinet 7 with three cubic feet of lecture notes 8 located? 9 A. Actually it is not quite that 10 simple. So some of the lecture notes 11 would have been in my -- in one of my 12 filing cabinets. 13 Q. You are pointing to the filing 14 cabinet to the right of your desk? 15 A. To the right. So that would -- 16 Q. That is the north side of the 17 office as you have drawn it, right? 18 A. No, it is not north. That 19 would be -- 20 MR. JAMES KLEIN: He meant just 21 on this side of the page. 22 A. Yes. Yes. 23 Q. You have two desks, one towards 24 the north side and the other one towards 25 the south side?</p>
<p>1 WILSON 2 editions, and then there were others who I 3 couldn't necessarily remember. 4 Q. How many of the books were you 5 able to look up on Amazon? 6 A. I don't recall the number. 7 Q. Was it more than five? 8 A. Yes, more than five. 9 Q. Was it more than ten? 10 A. I don't remember. 11 Q. Okay. Below that you list 12 lecture notes, correct? 13 A. Yes. 14 Q. And you say there is 15 approximately three cubic feet of lecture 16 notes created from 1979 to 2016, right? 17 A. Yes. 18 Q. Where were these lecture notes 19 kept? 20 A. Actually just to clarify, that 21 was in one location. I had stored 22 lecture notes in different locations, but 23 in one location at -- at my office at 25 24 Broadway they were kept in a filing 25 cabinet.</p>	<p>Page 179</p> <p>1 WILSON 2 A. Yes. 3 Q. So you pointed to an X to the 4 right of the desk that is located towards 5 the north side of the office as you've 6 drawn it, right? 7 A. Right. 8 Q. And so some of the lecture notes 9 were in that filing cabinets; is that 10 right? 11 A. That's correct. 12 Q. And were any lecture notes 13 located anywhere else in your office? 14 A. Yes. 15 Q. Where? 16 A. I had lecture notes on my 17 bookshelves. 18 Q. And that is along the east wall 19 of the office? 20 A. That's correct. 21 Q. Anywhere else? 22 A. Yes. I had lecture notes in my 23 assistant's office. 24 Q. So outside of this office, 25 correct?</p>

<p style="text-align: right;">Page 182</p> <p>1 WILSON 2 A. Yes. 3 Q. Anywhere else? 4 A. Yes. And I had lecture notes 5 in a storage closet. 6 Q. A storage closet at 25 Broadway? 7 A. Yes. 8 Q. And all together these lecture 9 notes were approximately three cubic feet 10 in volume? 11 A. No, it just perhaps in my office 12 would have been on the shelves and in the 13 desk, but there were more in my 14 assistant's office, more in the storage, 15 and then more on the main campus. 16 Q. Now, below that there is a 17 reference to personnel files, right, Dr. 18 Wilson? 19 A. Yes. 20 Q. Now, you are referring to files 21 relating to your own employment; is that 22 right, at the bottom of page 11? 23 A. Personnel files. And what is 24 your question? 25 Q. Those relates to files</p>	<p style="text-align: right;">Page 184</p> <p>1 WILSON 2 letter from David Levering Lewis, who was 3 a distinguished professor at Rutgers 4 University. There were others, but I 5 can't remember off the top of my head. 6 Q. You said most of your personal 7 files were located on the main campus, 8 right? 9 A. Most of my personnel files, not 10 personal. 11 Q. I meant personnel. 12 A. Okay. 13 Q. Where on the main campus? 14 A. In my office in James Hall in my 15 political science office. 16 Q. So you had an office at 25 17 Broadway and one in James Hall on the main 18 campus in Brooklyn, correct? 19 A. Partially correct. 20 Q. In what way wasn't it accurate? 21 A. I had an additional office at 22 Brooklyn College at the Center For 23 Diversity. I was director there. 24 Q. Did you have any files at your 25 office at the Center for Diversity?</p>
<p style="text-align: right;">Page 183</p> <p>1 WILSON 2 concerning your own employment history? 3 A. Well, yes, but it included other 4 personnel as well. But yes, my -- 5 Q. Where were these personnel files 6 as you've referred to them located? 7 A. Those would have been maybe in 8 the -- actually most of my personnel 9 files, not all, but most were on the main 10 campus in my office. 11 Q. And what was in these personnel 12 files? 13 A. Professional activities, grants. 14 Professional activities, grants, my 15 academic resume, promotion and tenure 16 files, letters of peer review for 17 promotion and tenure from leading experts 18 some of whom I remember. 19 Q. What letters do you remember? 20 A. A Yale University historian 21 named David Montgomery. 22 Q. Anybody else? 23 A. Yes, I believe Charles Hamilton, 24 who was a professor of government at 25 Columbia University. I think there was a</p>	<p style="text-align: right;">Page 185</p> <p>1 WILSON 2 A. Yes. 3 Q. What files did you have there? 4 A. I had one filing cabinet filled 5 with student records, participants in 6 programs I administered, and projects 7 pertaining to the Center For Diversity. 8 And then I also had research files 9 pertaining to issues of race, affirmative 10 action, so forth. 11 Q. And where were these research 12 files at the Center For Diversity? 13 A. In the administrative office at 14 the Center For Diversity. 15 Q. So that wasn't your office? 16 A. My personal -- it was the 17 director's office. I was the director, 18 so it was my office. Yes. 19 Q. And were these research files 20 locked? 21 A. I think one was locked, and one 22 was unlocked. 23 Q. And what volume of research 24 files did you have at this office at the 25 Center For Diversity?</p>

<p>1 WILSON 2 A. Both the locked and unlocked 3 would have been maybe six cubic feet file 4 cabinet top and bottom filled. 5 Q. Do you know what research files 6 were in the locked file? 7 A. That would have pertained to 8 student research records pertaining to one 9 of the programs I administered. 10 Q. What was in the unlocked file? 11 A. Issues dealing with racial 12 discrimination, affirmative action, 13 diversity in higher education, also 14 policies that I developed at the City 15 University. There may have been some 16 other research files pertaining to faculty 17 research. 18 Q. Were these research files your 19 personal research files? 20 A. I created them. 21 Q. Were they your personal research 22 files? 23 A. I don't know how to answer that 24 question. 25 Q. When you say you created, what</p> <p>1 WILSON 2 do you mean? 3 A. Well, the research would consist 4 of taking articles from multiple sources 5 and then making notations adding yellow 6 pads, clipping Post-It notes. So that is 7 what I mean on those articles and notes. 8 What I mean in terms of policies, these 9 were policies that I developed, but the 10 policies were subsequently adopted by the 11 University and by the college, so they 12 weren't my personal policies, but I 13 developed them. I am not sure if that is 14 your question. 15 Q. No, I think you've answered the 16 question. 17 Now, you placed a historical 18 value on your personnel files of 75,000, 19 correct? 20 A. Yes. 21 Q. That's \$75,000? 22 A. Yes. 23 Q. How did you arrive at that 24 number? 25 A. Well, my -- it was an estimate</p>	<p>Page 186</p> <p>1 WILSON 2 of looking at my manuscripts, which were 3 part of my personnel files, these 4 faculty -- you know, letters of 5 recommendation, teaching evaluations, 6 grants and documents and awards. And so 7 this was an estimate of the historical 8 value that I placed on it, so that is the 9 best I could tell you. 10 Q. Now, the manuscripts that you 11 are referring to, these are the 12 manuscripts of the books that you 13 published? 14 A. They were copies of my published 15 manuscripts, yes. 16 Q. These manuscripts, did you 17 prepare them on a computer or were they 18 hand typed? 19 A. A combination of handwritten 20 notes, typed, typewritten in the old days. 21 We had type writers, and then some were 22 created on a computer. 23 Q. Did you ever scan into a 24 computer any of your manuscripts? 25 A. No.</p> <p>Page 187</p> <p>1 WILSON 2 do you mean? 3 A. Well, the research would consist 4 of taking articles from multiple sources 5 and then making notations adding yellow 6 pads, clipping Post-It notes. So that is 7 what I mean on those articles and notes. 8 What I mean in terms of policies, these 9 were policies that I developed, but the 10 policies were subsequently adopted by the 11 University and by the college, so they 12 weren't my personal policies, but I 13 developed them. I am not sure if that is 14 your question. 15 Q. No, I think you've answered the 16 question. 17 Now, you placed a historical 18 value on your personnel files of 75,000, 19 correct? 20 A. Yes. 21 Q. That's \$75,000? 22 A. Yes. 23 Q. How did you arrive at that 24 number? 25 A. Well, my -- it was an estimate</p>	<p>Page 188</p> <p>1 WILSON 2 do you mean? 3 A. Well, the research would consist 4 of taking articles from multiple sources 5 and then making notations adding yellow 6 pads, clipping Post-It notes. So that is 7 what I mean on those articles and notes. 8 What I mean in terms of policies, these 9 were policies that I developed, but the 10 policies were subsequently adopted by the 11 University and by the college, so they 12 weren't my personal policies, but I 13 developed them. I am not sure if that is 14 your question. 15 Q. No, I think you've answered the 16 question. 17 Now, you placed a historical 18 value on your personnel files of 75,000, 19 correct? 20 A. Yes. 21 Q. That's \$75,000? 22 A. Yes. 23 Q. How did you arrive at that 24 number? 25 A. Well, my -- it was an estimate</p> <p>Page 189</p> <p>1 WILSON 2 do you mean? 3 A. Well, the research would consist 4 of taking articles from multiple sources 5 and then making notations adding yellow 6 pads, clipping Post-It notes. So that is 7 what I mean on those articles and notes. 8 What I mean in terms of policies, these 9 were policies that I developed, but the 10 policies were subsequently adopted by the 11 University and by the college, so they 12 weren't my personal policies, but I 13 developed them. I am not sure if that is 14 your question. 15 Q. No, I think you've answered the 16 question. 17 Now, you placed a historical 18 value on your personnel files of 75,000, 19 correct? 20 A. Yes. 21 Q. That's \$75,000? 22 A. Yes. 23 Q. How did you arrive at that 24 number? 25 A. Well, my -- it was an estimate</p>
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<p style="text-align: right;">Page 190</p> <p>1 WILSON 2 you didn't have access to your manuscripts 3 and your CV? 4 A. Well, it is more complicated in 5 that when you don't have access to your 6 research data, to your documents, to your 7 ability to document your standing in the 8 profession, basically when the tools of 9 the trade are taken from you it's -- it 10 makes finding future employment in that 11 area significantly more difficult if not 12 impossible. 13 Q. One of the things you said was 14 in your personnel files was a "Definitive 15 ACV, correct? 16 A. Yes. 17 Q. Is that the only copy you had of 18 your -- 19 A. Of that particular -- yes, it is 20 called a -- it is called an academic 21 curriculum vitae. That was the only 22 copy. 23 Q. And you are incapable of 24 duplicating it. Is that it? 25 A. Impossible.</p>	<p style="text-align: right;">Page 192</p> <p>1 WILSON 2 case, pages 11, 12, and the top, the very 3 top of 13 is set forth the value of 4 damaged documents and property by category 5 with regard to your personal property that 6 you said was taken and not returned; is 7 that correct? 8 A. That's correct. 9 Q. And there are various amounts, 10 dollar amounts ascribed to the loss of 11 that personnel property on pages 11 and 12 the very top of page 13, correct? 13 A. 11 and 13. 14 Q. 11, 12. And the top of 13. 15 A. Yes. 16 Q. And those dollar amounts were 17 arrived at before you retained expert 18 witnesses in this case, correct? 19 A. That's correct. 20 Q. Now, are you deferring to your 21 expert witnesses for the valuations of the 22 property that was lost and not returned to 23 you? 24 A. Yes. 25 Q. So the dollar amounts that are</p>
<p style="text-align: right;">Page 191</p> <p>1 WILSON 2 Q. All right. Going to -- 3 A. I am going to -- 4 Q. You want to take a break? 5 A. Yes. 6 Q. Fine. 7 (Recess taken.) 8 MR. MARK KLEIN: Back on the 9 record. 10 Q. Dr. Wilson, is there any 11 testimony you gave before you just took a 12 break that you would like to change or 13 modify? 14 A. Not at this moment, but I do 15 have a question. What time are we going 16 to continue to? 17 MR. MARK KLEIN: We don't need 18 to do this on the record. Off the 19 record. 20 (Discussion held off the 21 record.) 22 MR. MARK KLEIN: Back on the 23 record. 24 Q. Dr. Wilson, back to Exhibit 1, 25 which is your initial disclosures in this</p>	<p style="text-align: right;">Page 193</p> <p>1 WILSON 2 listed on pages 11, 12, and on top of 13 3 are not the amounts you are seeking for 4 the personal property that you say was 5 taken and not returned, right? 6 A. Let me just look at this for a 7 second here. 8 (Pause.) 9 A. Well the oak -- I just lost my 10 place here. I think for the oak easel and 11 for the Apple monitor, you know, it's 12 pretty accurate. 13 MR. JAMES KLEIN: I have a 14 question about that. I mean this is our 15 initial disclosure, and then we submitted 16 the expert reports as a Supplemental 17 Disclosure, so I don't think that having 18 Supplemental Disclosure necessarily means 19 that our initial disclosure is off the 20 table. 21 MR. MARK KLEIN: That is what I 22 am asking Dr. Wilson. 23 A. All right. I mean on the major 24 issues I would defer to the experts, but 25 on the oak easel and the Apple monitor I</p>

<p style="text-align: right;">Page 194</p> <p>1 WILSON 2 would abide by those, and others I would 3 defer to experts. 4 Q. Tell me about the oak easel that 5 is an easel you said was your wife's? 6 A. My wife's oak easel. 7 Q. And that was an easel that you 8 used to display the schedule at the 9 Graduate Center For Worker Education; is 10 that right? 11 A. So my -- my wife does art, and 12 she had a -- an arts easel, solid oak 13 easel, and she suggested and I asked 14 actually if I could use that because we 15 needed a display for students and for 16 events and so forth, and so it was a very 17 nice solid oak easel, and I looked at 18 easels, solid oak easels, and that was the 19 range. 20 Q. And you say that easel was never 21 returned to you; is that right? 22 A. Never returned but I asked for 23 it. 24 Q. And the Apple 36 inch monitor, 25 is that supposed to be Apple spelled</p>	<p style="text-align: right;">Page 196</p> <p>1 WILSON 2 Q. Where was that located? 3 A. On my desk. 4 Q. On your desk towards the north 5 side of the room? 6 A. Yes. 7 Q. Now, going back you refer to 8 further up on the page on page 12 you 9 refer to the loss of 30 years of 10 professional letters, correct? 11 A. Correct. 12 Q. And one of those letters was 13 from -- is listed here as quote "from 14 Harry S. Truman to Charles Wilson," 15 correct? 16 A. Yes, correct. 17 Q. Charles Wilson was your father? 18 A. That's correct. That's right. 19 Q. And another of those letters was 20 a letter from Ray Charles; is that right? 21 A. Yes. 22 Q. What was that letter? 23 A. So in the late 1970s Ray Charles 24 was involved in a political controversy, 25 and I wrote him a letter, you know,</p>
<p style="text-align: right;">Page 195</p> <p>1 WILSON 2 A-P-P-L-E? 3 MR. JAMES KLEIN: What page are 4 you we on now? 5 MR. MARK KLEIN: We are on page 6 12. 7 A. Yes, that is Apple misspelled by 8 the paralegal or whoever ultimately typed 9 it. 10 Q. And what year monitor was that? 11 A. That would have been -- that 12 would have been about 2011. 2010, 2011. 13 Q. And that was your own monitor? 14 A. My personal monitor, yes. 15 Q. Where was it? 16 A. It was in my office at the 17 Graduate Center For Worker Education on 18 one of my desks. 19 Q. And what size monitor was it? 20 A. A 36-inch office at the graduate 21 center? 22 A. The Graduate Center For Worker 23 Education. 24 Q. Are you guessing or estimating? 25 A. I am estimating.</p>	<p style="text-align: right;">Page 197</p> <p>1 WILSON 2 raising the issue of his politics, and 3 then he wrote a three-page letter back to 4 me pretty much defending himself and -- so 5 that was the nature of that exchange, and 6 so it was a pretty rare exchange, and it 7 was a very passionate letter from Ray 8 Charles, so -- 9 Q. Now, how many letters are you 10 referring to here that you say were lost? 11 A. Well, I -- I don't know the 12 total because it is over 30 years, but we 13 are talking hundreds, hundreds and 14 hundreds of letters. 15 Q. And where were these letters 16 kept? 17 A. I had a letter file on the main 18 campus in my office in political science. 19 There were some letters in the Center For 20 Diversity. I had letters in -- one of my 21 desk drawers. I am not sure which one. 22 Q. You are pointing to the desk 23 towards the north side of your office? 24 A. Yes, I had some letters there? 25 A. And then I also had letters in</p>

<p>1 WILSON 2 storage that would have either been 3 in -- yes, that would have been in the 4 Graduate Center For Worker Education 5 storage closet. 6 Q. Where was the Ray Charles 7 letter? 8 A. On the main campus. 9 Q. In your office in James Hall in 10 the main campus? 11 A. In my political science office. 12 Q. And -- 13 A. In James Hall. 14 Q. And where in your office at 15 James Hall was this letter? 16 A. That would have been in my file 17 cabinet in -- I had several file cabinets, 18 so it was in one of several file cabinets. 19 I had different desks. So it was in one 20 of my desk filing cabinets. 21 Q. Now, the letter from Harry S. 22 Truman to your father, when was that 23 letter written? 24 A. Actually that was a letter from 25 Roosevelt.</p>	<p>Page 198</p> <p>1 WILSON 2 is a reference to a letter from Truman. 3 Do you see that? 4 A. Same mistake. 5 Q. So you are talking about the 6 same letter in the first paragraph as well 7 as under archival records? 8 A. I don't see it on the 9 page -- no, that is the one I was talking 10 about. 11 MR. JAMES KLEIN: It is up here. 12 Q. So there are two references to 13 Harry S. Truman, right? 14 A. Right. 15 Q. And both of them are intended to 16 refer to a letter from Roosevelt to your 17 father? 18 A. That's right, correspondence 19 between the two. 20 MR. JAMES KLEIN: I think he 21 means Franklin Roosevelt to be complete. 22 A. FDR, not Theodore. 23 Q. But you place a value on the 24 letter -- it says "letter from Truman." 25 You are referring to the letter from</p>
<p>1 WILSON 2 Q. Why does it say from Harry S. 3 Truman instead of Roosevelt because I 4 think the -- the typo said president, and 5 maybe it got lost in the translation by 6 the paralegal, and I -- so but it was just 7 a typo, but it was President Roosevelt, 8 and it was with a series of letters in a 9 folder from my father. 10 Q. And where was this folder? 11 A. And that folder was on the main 12 campus. 13 Q. Where in the main campus? 14 A. At Brooklyn College in one my 15 files. 16 Q. Was the file named or labeled? 17 A. Well, every file that I had, you 18 know, was sequential and organized, so it 19 would have said dad or something on top or 20 my father or father's letters or something 21 to that affect. 22 Q. Now -- 23 A. I am sorry. I wrote on your 24 document. 25 Q. So further down the page there</p>	<p>Page 199</p> <p>1 WILSON 2 Roosevelt? 3 A. Correct. 4 Q. To your father at 150,000, 5 right? 6 A. Right. 7 Q. And farther up on the page you 8 refer to loss of over 30 years of 9 professional letters including the one 10 from Harry S. Truman to Charles Wilson, 11 which you said should say from Roosevelt, 12 FDR, to your father at a total of 13 \$250,000, right? 14 A. That is what I mentioned, yes. 15 Q. Now, also under the heading 16 archival records, do you see that? 17 A. I do. 18 Q. There is a reference to Don 19 Watkins papers? 20 A. Yes. 21 Q. And what are those? 22 A. So Don Watkins was a 23 distinguished professor at CUNY, who was 24 aware of my archival expertise, and he was 25 getting up in years, and he wanted me to</p>

<p style="text-align: right;">Page 202</p> <p>1 WILSON 2 process and archive and preserve his 3 decades of civil rights work and activism 4 primarily, and so I agreed, and he started 5 giving me boxes of his material to process 6 for archiving. 7 Q. Where were Don Watkins' papers 8 kept by you? 9 A. They were kept in boxes at -- in 10 my office at the Graduate Center For 11 Worker Education. 12 Q. In the office diagram that you 13 have drawn on Exhibit 2? 14 A. Yes, not on the shelves, but I 15 think they were just in boxes by the side 16 of my desk, and it was a 17 separate -- separate series of two or 18 three boxes, and I believe he -- he had a 19 stack of -- not I believe. I know he 20 gave me a stack of magazines from the 21 1960s. As I recall, it was like a Ebony 22 Magazine and Life Magazine and March on 23 Washington. So there was a stack, and I 24 had one stack on one of my shelves here 25 and then various documents from the</p>	<p style="text-align: right;">Page 204</p> <p>1 WILSON 2 Q. That is a particular kind of 3 box. 4 A. I am not familiar with a bankers 5 box. 6 MR. JAMES KLEIN: It is a box 7 they use for archiving records. 8 Q. Also under archival records, you 9 refer to a photo of WEB Debevois. Do you 10 see that? 11 A. Hold on. I don't see it yet. 12 Q. What photo was that? 13 A. That was a photo that was 14 actually hanging on my wall at the 15 Graduate Center For Worker Education, and 16 it was a photo of WEB Debevois. 17 Q. And where did you get the photo? 18 A. That photo was given to me by I 19 believe it was by Benjamin MacLawrence. 20 Q. Now, did you have insurance on 21 any of these letters, archival records, 22 research papers or books? 23 A. No. What do you mean by 24 insurance? 25 Q. Did you have insurance? You know</p>
<p style="text-align: right;">Page 203</p> <p>1 WILSON 2 students on violence coordinating 3 committees from different organizations 4 that he worked with, letters, 5 correspondence, you know, 6 things -- important things from that 7 period. 8 Q. So you had two or three boxes of 9 materials that Don Watkins had given you 10 and a stack of magazines; is that right? 11 A. That's right. 12 Q. And what size boxes were these? 13 A. These boxes would have been like 14 I said about two and a half feet 15 approximately. So, you know -- 16 Q. Two and a half feet? 17 A. About two and a half feet by a 18 foot and a half. They were fairly big 19 boxes. 20 Q. What color were these boxes? 21 A. Standard cardboard boxes. 22 Q. Were they bankers boxes? 23 A. No, I am not sure what a bankers 24 box is actually. Maybe they were, but 25 what do you mean by bankers box?</p>	<p style="text-align: right;">Page 205</p> <p>1 WILSON 2 what insurance is? 3 A. My understanding of insurance 4 because whenever this issue came up was 5 that the university itself is insured, so 6 that is my understanding of insurance. 7 Q. Well, you're claiming that 8 materials for which you are seeking 9 millions of dollars in this case were your 10 personal records and documents and letters 11 and archival records and books, correct? 12 A. Correct. 13 Q. Did you personally have any 14 insurance on any of these items? 15 A. No, I had no personal insurance. 16 MR. MARK KLEIN: I am going to 17 ask the reporter to mark as Wilson Exhibit 18 4 a document titled "Defendants' First Set 19 of Interrogatories to Plaintiff." 20 (Wilson Exhibit 4 marked for 21 identification.) 22 (Document handed to witness.) 23 Q. Dr. Wilson, I showed you what 24 has been marked as Exhibit 4. You can 25 look through it if you would like, but my</p>

<p>1 WILSON 2 first and only question at this point is 3 whether you have seen it before. 4 A. Is there a date on this? 5 Q. If you go to page -- to the last 6 page, page 12, it is dated May 22, 2018. 7 A. I am looking for my signature. 8 Q. No, these are defendants' 9 interrogatories to you. My question is 10 whether you have seen this before. 11 MR. JAMES KLEIN: These are not 12 your responses. These are things -- the 13 questions that they asked you. These are 14 just questions. It doesn't have answers 15 where you are verifying it. 16 Have you seen these questions? 17 Is that the question? 18 MR. MARK KLEIN: That was the 19 question. 20 A. Yes, I have seen these. 21 Q. And did you put together 22 responses to them? 23 A. Yes, I worked with counsel. 24 Q. All right. I ask the reporter 25 to mark as Wilson Exhibit 5 "Plaintiff's</p>	<p>Page 206</p> <p>1 WILSON 2 A. I think I gave the first 3 typewritten draft to the staff. Right. 4 Q. Did you review the final 5 document before it went out? 6 A. I am not sure. 7 Q. To the best of your knowledge, 8 is Plaintiff's Answer to Defendant's First 9 Set of Interrogatories true and accurate? 10 A. I would have to go over it again 11 carefully to make sure. 12 Q. Are you aware of any 13 inaccuracies in the document? 14 A. Well, I haven't read the 15 document, so I would have to take my time 16 and make sure that everything was correct. 17 MR. MARK KLEIN: I am going to 18 ask the reporter to mark as Exhibit 6 a 19 document titled "Verification." 20 (Wilson Exhibit 6 marked for 21 identification.) 22 (Document handed to witness.) 23 Q. Dr. Wilson, I show you what has 24 been marked as Exhibit 6. Do you recall 25 signing that document?</p>
<p>1 WILSON 2 Answers to Defendants' First Set of 3 Interrogatories" dated July 13, 2018. 4 (Wilson Exhibit 5 marked for 5 identification.) 6 (Document handed to witness.) 7 Q. I will show you what has been 8 marked as Exhibit 5, sir, and we will go 9 through this in more detail, but have you 10 seen that before? 11 A. Yes, I have seen this before. 12 Q. And under that heading of the 13 various interrogatories there are lists of 14 information, correct? 15 A. Yes. 16 Q. Did you have any role in 17 preparing the lists of information under 18 the headings? 19 A. Yes, I did. 20 Q. What role did you have? 21 A. I drew up the list and gave it 22 to the paralegal. 23 Q. When you say you drew up the 24 list, in what way did you draw up the 25 list? Did you type it?</p>	<p>Page 207</p> <p>1 WILSON 2 A. Yes, I do. 3 Q. That's your signatures on the 4 page? 5 A. Yes, it is. 6 Q. And you declared in this 7 Verification under penalty of perjury that 8 the facts stated in plaintiff's answers in 9 the first set of interrogatories were true 10 and correct to the best of your 11 information, knowledge, and belief? 12 A. To the best of my knowledge. 13 Q. To the best of your knowledge, 14 information, and belief, right? 15 A. That's right. I just have to 16 confirm it and reread it and make sure 17 that is still to the best of my knowledge. 18 Q. Okay. Now, we are going to 19 have to read this exhibit and this exhibit 20 together because Exhibit 6 doesn't -- I am 21 sorry. Exhibit 5 doesn't have the 22 questions that you were asked. 23 A. This doesn't have these 24 questions? 25 Q. This doesn't have these</p>

<p>1 WILSON 2 questions. 3 MR. JAMES KLEIN: This is the 4 question, and that is the answer, so you 5 have to refer to both of them. 6 Q. So if you go to page 6 of 7 Exhibit 4 at the bottom of the page, you 8 see Interrogatory 1, right? 9 A. Yes. 10 Q. Okay. And if you go to page 1 of 11 Exhibit 5, you see where it says 12 Interrogatory 1, right? 13 A. Yes. 14 Q. And do you understand that the 15 information that appears in A through JJ 16 on pages 1 through 3 of Exhibit 5 is a 17 response to an Interrogatory 1 on page 6 18 of Exhibit 4? 19 A. Yes. 20 Q. And you put together the 21 information that appears in A through JJ, 22 correct? 23 A. Correct. 24 Q. I think we have gone through 25 Interrogatory 1 or the response in</p> <p>1 WILSON 2 connection with your initial 3 interrogatories, so I am not going to go 4 through it all again unless you would like 5 me to. 6 A. So this is now -- 7 Q. I haven't asked you a question 8 yet. 9 MR. JAMES KLEIN: He hasn't 10 asked you anything yet. 11 THE WITNESS: Okay. 12 Q. Let me direct your attention to 13 page 5 of Exhibit 5. 14 A. Okay. Page 5, Exhibit 5. 15 Q. Page 5, Exhibit 5 is a response 16 to Interrogatory 3, correct? 17 A. That would be on a different 18 page. 19 Q. That is on page 7 of Exhibit 4. 20 All right. 21 A. Okay. 22 Q. Interrogatory No. 3 asks that 23 you "Identify each and every wrongful act 24 allegedly taken by Cheng for which 25 plaintiff asserts a claim or seeks damages</p>	<p>Page 210</p> <p>1 WILSON 2 in this case." Do you see that sir? 3 A. I see that. 4 Q. So are we oriented as to what 5 the information on pages 5 and 6 of 6 Exhibit 5 respond to? 7 A. Oriented. I haven't seen them 8 yet, but yes. 9 Q. Okay. Directing your attention 10 to paragraph 5 under Interrogatory 3 -- 11 A. Paragraph 5. 12 Q. -- it says "Cheng made false 13 defamatory statements to Ivy Rich, Don 14 Tumaniro, Steve Leberstein, and Erica 15 Gaskins that plaintiff was stealing ad 16 engaged in criminal conduct at GCWE," 17 Right? 18 A. Yes. 19 Q. Those are statements you 20 testified previously took place in the end 21 of 2012, beginning of 2013, correct? 22 A. Correct. 23 Q. Okay. If you could go to 24 paragraph 12 at the bottom of page 5. 25 A. Page 5. I have it.</p> <p>Page 211</p> <p>1 WILSON 2 connection with your initial 3 interrogatories, so I am not going to go 4 through it all again unless you would like 5 me to. 6 A. So this is now -- 7 Q. I haven't asked you a question 8 yet. 9 MR. JAMES KLEIN: He hasn't 10 asked you anything yet. 11 THE WITNESS: Okay. 12 Q. Let me direct your attention to 13 page 5 of Exhibit 5. 14 A. Okay. Page 5, Exhibit 5. 15 Q. Page 5, Exhibit 5 is a response 16 to Interrogatory 3, correct? 17 A. That would be on a different 18 page. 19 Q. That is on page 7 of Exhibit 4. 20 All right. 21 A. Okay. 22 Q. Interrogatory No. 3 asks that 23 you "Identify each and every wrongful act 24 allegedly taken by Cheng for which 25 plaintiff asserts a claim or seeks damages</p>
<p>1 WILSON 2 connection with your initial 3 interrogatories, so I am not going to go 4 through it all again unless you would like 5 me to. 6 A. So this is now -- 7 Q. I haven't asked you a question 8 yet. 9 MR. JAMES KLEIN: He hasn't 10 asked you anything yet. 11 THE WITNESS: Okay. 12 Q. Let me direct your attention to 13 page 5 of Exhibit 5. 14 A. Okay. Page 5, Exhibit 5. 15 Q. Page 5, Exhibit 5 is a response 16 to Interrogatory 3, correct? 17 A. That would be on a different 18 page. 19 Q. That is on page 7 of Exhibit 4. 20 All right. 21 A. Okay. 22 Q. Interrogatory No. 3 asks that 23 you "Identify each and every wrongful act 24 allegedly taken by Cheng for which 25 plaintiff asserts a claim or seeks damages</p>	<p>Page 212</p> <p>1 WILSON 2 in this case." Do you see that sir? 3 A. I see that. 4 Q. So are we oriented as to what 5 the information on pages 5 and 6 of 6 Exhibit 5 respond to? 7 A. Oriented. I haven't seen them 8 yet, but yes. 9 Q. Okay. Directing your attention 10 to paragraph 5 under Interrogatory 3 -- 11 A. Paragraph 5. 12 Q. -- it says "Cheng made false 13 defamatory statements to Ivy Rich, Don 14 Tumaniro, Steve Leberstein, and Erica 15 Gaskins that plaintiff was stealing ad 16 engaged in criminal conduct at GCWE," 17 Right? 18 A. Yes. 19 Q. Those are statements you 20 testified previously took place in the end 21 of 2012, beginning of 2013, correct? 22 A. Correct. 23 Q. Okay. If you could go to 24 paragraph 12 at the bottom of page 5. 25 A. Page 5. I have it.</p> <p>Page 213</p> <p>1 WILSON 2 MR. MARK KLEIN: For the record, 3 Exhibit 5 also didn't have page numbers, 4 so I handwrote in the page numbers. 5 MR. JAMES KLEIN: I see that. 6 Q. So paragraph 12 at the bottom of 7 page 5 says, "Cheng engaged in ongoing 8 defamation of plaintiff to other CUNY 9 professors and published information in 10 New York Times Kingsman," and then it 11 continues on to the next page. Do you see 12 that, sir? 13 A. I do. 14 Q. Can you identify any of the 15 defamatory statements that are referred to 16 in paragraph 12? 17 A. The same as I mentioned in 18 number 5 pertaining to Wilson stealing and 19 being a criminal that he made, so that 20 is -- that is what the reference is to. 21 Q. So that was in 2012 and 2013, 22 right? 23 A. In that time frame. Let's see. 24 Wait a minute. Hold on one second. That 25 would have been in -- this was -- I think</p>

<p style="text-align: right;">Page 214</p> <p>1 WILSON 2 he met with them with these groups, with 3 these people, these individuals in 2014, 4 and so it -- it would have been more 5 accurate to say 2014 is when Cheng -- 6 because that is -- we will have to 7 double-check, but that is when they told 8 me they met with him, and they had a 9 series of meetings with Cheng.</p> <p>10 Q. You testified earlier today that 11 they told you they met with him in 2012 12 and 2013?</p> <p>13 A. Yes, but I am revising that, and 14 it would have been closer to the -- in the 15 time frame of 2014.</p> <p>16 Q. Can you identify any defamatory 17 statement that Mr. Cheng made in 2014?</p> <p>18 A. Well, what was reported to me 19 was he, Cheng, did not want my 20 photographic representation in the 21 historical documentation of the 22 institutional history of the Graduate 23 Center For Worker Education, which was a 24 project that he hired the Labor Arts 25 Society to conduct, and he said basically</p>	<p style="text-align: right;">Page 216</p> <p>1 WILSON 2 Q. Okay. Previously you told me 3 that Steve Leberstein told you that Ivy 4 Rich told him that Terrence Cheng had said 5 you were a thief, right?</p> <p>6 A. That's correct.</p> <p>7 Q. Now, are you talking about 8 something different --</p> <p>9 A. Well --</p> <p>10 Q. -- with regard to Mr. 11 Leberstein?</p> <p>12 A. Slightly different. That is 13 Leberstein had ongoing meetings and 14 conflicts with Ivy Rich over the 15 historical representation of the Center 16 For Worker Education. She was supposed 17 to represent it, and Leberstein provided 18 photos, and she didn't want to use my 19 photo because Terrence Cheng said you 20 can't -- he is a crook or he is a thief. 21 You can't use Wilson's photograph.</p> <p>22 Q. So what Leberstein was telling 23 you was based on what Ivy Rich had told 24 him in 2012?</p> <p>25 A. That is one.</p>
<p style="text-align: right;">Page 215</p> <p>1 WILSON 2 don't use Wilson's photo because he is a 3 crook. He is a thief. This is what was 4 reported to me contemporaneously at that 5 time.</p> <p>6 Q. And who reported this to you?</p> <p>7 A. I heard it from actually a 8 couple of sources. I heard it from 9 Leberstein. I heard it from Erica 10 Gaskins, and I heard it at that time from 11 Don Tuminaro, and these were widely -- you 12 know, that was going by -- his staff were 13 going around telling everybody I am a 14 crook. I am a thief, and that was in the 15 New York Times article.</p> <p>16 Q. I asked you what Mr. Cheng said.</p> <p>17 A. So my understanding of what 18 Cheng said is in one of the meetings that 19 Leberstein, Gaskins, and Tumaniro had said 20 that he mentioned my name specifically 21 and, you know, criminality, criminal 22 management, criminal acts. I got 23 different stories from people who were 24 there years back at the time that it 25 happened.</p>	<p style="text-align: right;">Page 217</p> <p>1 WILSON 2 Q. Yes?</p> <p>3 A. Yes. Number two, he made a 4 similar comment to me when he had a 5 meeting or a series of meetings, and it 6 was in one of a series of meetings when he 7 called me up afterwards and he --</p> <p>8 MR. JAMES KLEIN: A series of 9 meetings with whom?</p> <p>10 A. I'm sorry. He had a series of 11 meetings -- sorry. He had a series of 12 meetings with Terrence Cheng with a small 13 group of people, including these people, 14 including Leberstein, Tumaniro, and 15 Gaskins, and the meetings were around the 16 Center for Worker Education and what was 17 going to happen to it. And so Leberstein 18 told me, and they all told me that Cheng 19 lied to them about the program in the 20 Center For Worker Education, and then they 21 all in their own ways said that the 22 program had been criminalized, and 23 essentially Cheng was there to clean it 24 up, and that was -- so there was 25 criminalization of me but not simply me,</p>

<p style="text-align: right;">Page 218</p> <p>1 WILSON 2 but me, the management of the Center For 3 Worker Education, as well as students. 4 It was like there was a criminal cloud 5 over everybody. 6 Q. Now, when exactly did 7 Leberstein, Tumaniro, and Erica Gaskins 8 tell you that Mr. Cheng had said that? 9 A. I'll have to go back and 10 double-check the dates. I am not 11 absolutely positive on the dates. 12 Q. What are you going to look at to 13 double-check the dates? 14 A. I actually -- I have to see if 15 there is any documents pertaining to those 16 meetings. I mean I don't know. I don't 17 know exactly how I can double-check. 18 Q. Do you know of any documents 19 pertaining to these meetings sitting here 20 today? 21 A. Leberstein may have documents 22 about those meetings. 23 Q. He may or he does? 24 A. I can't say for sure, but there 25 is -- you know, he was at the meetings,</p>	<p style="text-align: right;">Page 220</p> <p>1 WILSON 2 Q. Okay. You have read that to 3 yourself? 4 A. Yes. 5 Q. What is that a reference to? 6 A. That's a reference to in maybe 7 2018 I went to the Graduate Center For 8 Worker Education, and I photographed the 9 pictorial representations of the 10 institutional history of the Graduate 11 Center For Worker Education to document 12 how my historical contribution and role in 13 the center had been treated as a result of 14 the defamatory comments by Cheng. 15 Q. So you're referring to videos 16 that you took in 2018? 17 A. Yes, of the work that was 18 produced earlier by Ivy Rich. 19 Q. And what is your understanding 20 of what these videos show? 21 A. The videos show, as I recall, 22 two very large murals, pictorial and 23 documentary representations of some of the 24 highlights of the 30-year history or some 25 span of time of the Center For Worker</p>
<p style="text-align: right;">Page 219</p> <p>1 WILSON 2 and so -- and these were years ago, so he 3 may have the agenda, the meetings, the 4 notes. 5 Q. Did you ever ask him for any 6 such documents? 7 A. I did ask him for those 8 documents, yes. 9 Q. And what did he say? 10 A. He said he would look for them. 11 Q. When did you ask him for those 12 documents? 13 A. This would have been a month or 14 two ago. 15 Q. And has he gotten back to you as 16 to whether he found any documents? 17 A. No. 18 Q. I would like to direct your 19 attention to paragraph 19 on page 6 of 20 Exhibit 5. 21 A. Paragraph 19, page 6. 22 Q. Right. Read it to yourself, 23 what is listed there, documentary video 24 evidence. Do you see that? 25 A. Yes.</p>	<p style="text-align: right;">Page 221</p> <p>1 WILSON 2 Education, and it showed many of the 3 highlights and accolades, and it had a 4 very large picture of a former director Ed 5 Rogowski, whose picture was prominently 6 displayed, and then -- but all of the 7 accomplishments were accomplishments under 8 my leadership, and I looked for my 9 picture, and there was a tiny picture with 10 my face with some other people, and it 11 said I think just Joe Wilson, and -- and 12 Leberstein told me he had to actually 13 argue and fight for that. It was an 14 ongoing tension between him and Ivy Rich 15 because Ivy was told by Cheng not to 16 include my picture, and Leberstein said 17 no, you have to. This -- all of the 18 things that you are talking about were 19 created by Professor Wilson and under his 20 leadership, and it is just not fair and 21 not historically accurate. So I think as 22 a compromise after argumentation I think 23 that is what she kind of concluded that 24 Cheng would allow her to do. 25 Q. So it is your understanding that</p>

<p style="text-align: right;">Page 222</p> <p>1 WILSON 2 these videos that you personally took 3 reflect your absence from the walls of the 4 graduate center -- 5 A. My exclusion, conscious 6 exclusion, yes. 7 Q. And besides showing according to 8 you your conscious exclusion on the walls 9 of the Graduate Center For Worker 10 Education, do you they show anything else? 11 A. Yes, they showed my 12 accomplishments but without attribute. 13 Q. Okay. All right. I would like 14 to go to page 8 of Exhibit 5. 15 A. Page 8. 16 Q. Under the heading Interrogatory 17 6. Do you see that? 18 A. Yes. 19 Q. Okay. And if you go to page 20 7 -- 21 A. I don't have a page 7. I was on 22 page 7. 23 Q. You are on page 7 of Exhibit 4. 24 Do you see Interrogatory 6 asks you to 25 "Identify any economic injuries which</p>	<p style="text-align: right;">Page 224</p> <p>1 WILSON 2 was available, and Professor Cunningham's 3 professional colleague, who was the chair 4 or was one of the directors of that 5 institute, you know, he spoke to him or 6 contacted him, but he looked to try to get 7 me a position at this institute, and 8 because of that controversy told me that 9 he was just not able to pursue that to 10 fruition because -- 11 Q. When was that? 12 A. That would have been in 2014, 13 2015. 14 Q. The next person is David Addams. 15 I believe you talked about that 16 previously? 17 A. Yes. 18 Q. Do you have anything to add to 19 what you testified previously about your 20 attempts to get a position from Mr. 21 Addams? 22 A. Not at this moment. 23 Q. The next person listed is Warren 24 Whitlock, various positions and 25 consultancy. Who is Mr. Whitlock?</p>
<p style="text-align: right;">Page 223</p> <p>1 WILSON 2 plaintiff claims to have sustained as a 3 result of the acts alleged in the 4 complaint," and it continues, right? 5 A. Yes. 6 Q. And under Interrogatory 6 in 7 Wilson Exhibit 5, you list a number of 8 people under the sentence "Plaintiff was 9 denied employment and following positions 10 by the following persons." Do you see 11 that, sir? 12 A. Yes. 13 Q. Okay. One is Cunningham. That 14 is a reference to Professor Cunningham in 15 Africana studies at Brooklyn College, 16 right? 17 A. Well, Professor Cunningham, yes, 18 was at Brooklyn College, but the 19 opportunity was at Columbia University. 20 Q. And what opportunity was that? 21 A. There was a faculty position in 22 the -- I am trying to remember the exact 23 name. There was an African American 24 Institute at Columbia University, 25 and -- and it was a teaching position that</p>	<p style="text-align: right;">Page 225</p> <p>1 WILSON 2 A. So Warren Whitlock is a 3 management expert and familiar with EEO 4 policies and affirmative action, and he 5 has had high ranking positions in Columbia 6 University, in the Department of Defense, 7 and I -- actually the army. I think it 8 was U.S. Army Department of Defense, and 9 maybe one or two other institutions, and 10 so, you know, I asked Whitlock to find a 11 position or identify a position because he 12 was highly ranked, and he said that it 13 wouldn't withstand government review. 14 Q. When did he tell you this? 15 A. This would have been starting in 16 2014, 2015. 17 Q. Did he tell you why it wouldn't 18 withstand government review? 19 A. Yes, he said the government does 20 ex tentative background checks and as soon 21 as your name comes up in the New York 22 Times you can't get a job. 23 Q. Does Mr. Whitlock know that the 24 neutral arbitrator in the arbitration 25 between you and CUNY upheld your</p>

<p>1 WILSON 2 termination? 3 A. Well, he knows that there were 4 no criminal acts, and he was aware that I 5 was terminated. 6 Q. Does he know that a neutral 7 arbitrator upheld your termination? 8 A. I don't know what he knows. 9 Q. Who is Joe McDermott? 10 A. Joe McDermott was the director 11 of the Consortium For Worker Education. 12 Q. Where is that? 13 A. It is located in Manhattan and 14 New York City. 15 Q. And you spoke to Mr. McDermott 16 about employment opportunities? 17 A. Yes, I did. 18 Q. When? 19 A. Starting in probably 2013, '14, 20 '15. 21 Q. What did Mr. McDermott tell you? 22 A. Essentially that, you know, they 23 receive government funding, and it is just 24 not a good profile for them to have, you 25 know -- have me working in that type</p> <p>1 WILSON 2 of -- that type of environment because 3 they seek government funding, and they are 4 very closely monitored, and this is 5 just -- it would be too controversial and 6 so forth. 7 Q. You list Ronald Mason. Have 8 you spoken to Mr. Mason about teaching and 9 consulting positions? 10 A. Yes. 11 Q. When? 12 A. This would have been a year or 13 two ago. 14 Q. What did Mr. Mason tell you? 15 A. Initially he seemed favorably 16 disposed. Then on a subsequent 17 conversation he mentioned the New York 18 Times article, and I haven't heard from 19 him since. 20 Q. Was Mr. Cheng quoted in New York 21 Times article? 22 A. Not to my knowledge. 23 Q. Is Dr. Currah quoted in the 24 Times article? 25 A. Not to my knowledge.</p>	<p>Page 226</p> <p>1 WILSON 2 Q. Is Ms. Isaacson quoted in the 3 Times article? 4 A. I think so. 5 Q. You think she is quoted? 6 A. She is referenced. Her name is 7 there. 8 Q. Is she quoted? 9 A. I would have to look at the 10 article again, but she is the source. It 11 listed a source for the defamatory 12 comments. 13 Q. Who is Jack Zevin? 14 A. Jack Zevin was a professor at 15 Queens College, I believe a professor of 16 education, and he was on the board of a 17 research organization, and -- so he is a 18 professor at Queens College and the name 19 of the research organization escapes me 20 know. 21 Q. And you spoke to Mr. Zevin about 22 consulting opportunities? 23 A. No, I actually had a consulting 24 opportunity with him in 2012 that -- that 25 ended.</p> <p>Page 227</p> <p>1 WILSON 2 Q. Did you work with Mr. Zevin in 3 connection with the Taft Institute? 4 A. The Taft Institute, yes. 5 Q. Okay. So was that consulting 6 relationship with the Taft Institute that 7 you are referring to here -- 8 A. That's correct. 9 Q. -- that you lost in 2012? 10 A. That's right. Yes, 2012 I 11 believe it was. Yes, 2012. 12 Q. All right. Now, you referred 13 to Immanuel Ness, Professor Ness for 14 Publishing Imaging and Consulting. Do 15 you see that? 16 A. Yes, I do. 17 Q. Did you speak with Mr. Professor 18 Ness about employment opportunities? 19 A. Yes. Initially early on, yes, 20 in the -- in 2012 Professor Ness said he 21 would look for other opportunities for me, 22 although none materialized, and we 23 collaborated on a number of works, 24 and -- but at the time of the -- and in 25 fact he was a -- well, yes. I did speak</p>
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<p style="text-align: right;">Page 230</p> <p>1 WILSON 2 with him about publishing, editing, and 3 consulting, yes. 4 Q. And what, if anything, has 5 happened as a result of your speaking with 6 Professor Ness about that? 7 A. We no longer speak. 8 Q. When did you last speak with 9 him? 10 A. Let's see. It would have been 11 in early 2016. 12 Q. Why don't you any longer speak, 13 you and Professor Ness? 14 A. I called him and reached out to 15 him on numerous occasions, but he -- he 16 never returned my calls. 17 Q. When was the last time you spoke 18 with Dominick Tumaniro? 19 A. Maybe a month or so ago. 20 Q. And what did you say to him and 21 what did he say to you? 22 A. So actually he told me that he 23 spoke to you. 24 Q. Right. And what else did he 25 tell you?</p>	<p style="text-align: right;">Page 232</p> <p>1 WILSON 2 who told him -- Henning told Tumaniro that 3 I was stealing, and so -- so this was just 4 the whole swirling thing, and then he also 5 told me that he was terminated as a 6 professor there in this whole environment 7 where everybody had been criminalized 8 including him and -- you know, the whole 9 situation with Cheng at the helm, 10 but -- so that is essentially what he told 11 me. 12 Q. Did Mr. Tumaniro tell you 13 whether he had said whether Mr. Cheng had 14 accused you of engaging in criminal 15 activity? 16 A. He told me he couldn't recall at 17 that moment. 18 Q. Have you had any subsequent 19 conversations with him? 20 A. No. 21 Q. Now, let's go to Interrogatory 22 14 on page 12 of Exhibit 15. 23 A. Page -- what page was that? 24 Q. Page 12. 25 A. Okay. Page 12.</p>
<p style="text-align: right;">Page 231</p> <p>1 WILSON 2 A. And he said that you tricked him 3 into speaking to him. He told me that 4 you called him and told him that he 5 had -- that you had the right to speak 6 with him, and then he engaged in 7 conversation with you that he thought he 8 had at that moment a legal obligation to 9 speak with you because of your phraseology 10 that you had the right, and he thought it 11 was a legal -- like if you don't do this, 12 you are in trouble. That is what he 13 felt. 14 Q. What else did he tell you about 15 our conversation? 16 A. He said you asked him mainly 17 about Cheng, and he said he couldn't 18 remember much about Cheng, but he 19 remembered that the whole environment, 20 everybody was criminalized. He was 21 criminalized. The program was 22 criminalized. He said, you know, upon 23 reflection that essentially that -- oh, 24 that he mentioned one person in 25 particular, a labor leader, Bill Henning,</p>	<p style="text-align: right;">Page 233</p> <p>1 WILSON 2 Q. And under interrogatory 14, and 3 if you can go to interrogatory 14 on page 4 9 of this document, Exhibit 4 -- 5 A. Page 9, Exhibit 4. 6 Q. Yes. 7 Q. Interrogatory 14 says, 8 "Identify, one, the content of statements 9 that Cheng allegedly 'repeated' to the 10 Labor Arts Society as alleged in paragraph 11 62 of the complaint." 12 A. One moment, please. What are 13 the two references on page 9, which 14 number? 15 Q. Interrogatory number 14. 16 A. 14. 17 Q. All right. 18 A. Yes. 19 Q. You can read it to yourself, 20 right? 21 A. Yes. 22 Q. And one of the things 23 Interrogatory 14 asks is the date on 24 which -- and location at which Cheng 25 allegedly repeated "Such statements." Do</p>

<p>1 WILSON 2 you see that? 3 A. Yes. 4 Q. Now, if you look at page 12 of 5 Exhibit 5, the dates that are given in 6 that response are 2013 and 2012, right? 7 A. I actually thought that was room 8 2013 meetings -- I thought that was room 9 2013 at BC because what I was told 10 subsequently was that they met, and there 11 was some confusion about that, whether 12 they were meeting at Brooklyn College or 13 at the Graduate Center for Origination, 14 and maybe they met both places. So -- 15 Q. So you think that is room 2013, 16 not the year 2013? Is that what you are 17 telling me? 18 A. What I am telling you is I am 19 not sure of the date they had those series 20 of meetings, and I am not positive of the 21 location because I have heard two 22 different things. I am not sure. 23 Q. When did the meetings take 24 place? 25 A. I am not sure.</p>	<p>Page 234</p> <p>1 WILSON 2 A. This was in 2012, but he 3 definitely -- but the administrative staff 4 did report it to Cheng specifically Craig 5 Wilson, the administrative staff, and I 6 know Phillips. There may have been 7 others as well. 8 Q. Okay. If you go to page 14 of 9 Exhibit 5, in the middle of the page there 10 is a reference to a letter from president 11 Harry S. Truman to Charles Wilson, right? 12 A. Right. 13 Q. And is that the letter that you 14 said should have been described as one 15 from President Roosevelt to Charles 16 Wilson? 17 A. Right. 18 Q. So on two different documents 19 you described the letter which you place a 20 value of 150,000 as being from the wrong 21 president, right? 22 A. It was a president, but it was 23 incorrect. It was Roosevelt and not 24 Truman. 25 Q. I know also in that same group of</p>
<p>1 WILSON 2 Q. What years? 3 A. It was either 2013 or 2014, but 4 they would have to confirm. I am not 5 sure. I am telling you I don't know for 6 sure -- 7 Q. Okay. 8 A. -- by the reference at the 9 bottom that asked me about. 10 Q. Yes. 11 A. On interrogatory 14, the last 12 question that date is correct in terms of 13 as Max Azoula and Jose Ohyan and Immanuel 14 Ness, so that -- that is correct. 15 Q. You are referring to statements 16 by "Cheng's administrative team", right? 17 A. That's correct. 18 Q. Not by Cheng himself? 19 A. Well, more specifically by 20 Currah to Ness in particular, specifically 21 Currah to Ness. 22 A. And I don't know if Ness had any 23 conversations with Cheng at all. He may 24 have. 25 Q. This was in 2012 in any event?</p>	<p>Page 235</p> <p>1 WILSON 2 listings you refer to Charles Wilson's 3 oral history tapes. 4 A. Yes. 5 Q. Where were those oral history 6 tapes kept? 7 A. Those were kept at Brooklyn 8 College at my political science office. 9 Q. Where in Brooklyn College at 10 your political science office? 11 A. In one of my file cabinets. 12 Q. And it is your testimony that 13 this is the only copy of those oral 14 history tapes? 15 A. There is no other copy. 16 Q. Your father was a professor? 17 A. No. 18 Q. What was he? 19 A. Well, that is a complicated 20 question. He wasn't simply one thing, so 21 -- 22 Q. Tell me. 23 A. Well, my father was a political 24 activist. He was a trade union leader. 25 He was a journalist. He ran for senate in</p>

<p style="text-align: right;">Page 238</p> <p>1 WILSON 2 the State of Illinois. He was a leader 3 in the American Communist Party on the 4 Central Committee. 5 Q. Okay. Thank you. 6 A. What time do you have? 7 Q. 4. 8 A. I am just going to walk around 9 the room for a second and stretch. 10 MR. JAMES KLEIN: Can we take 11 another ten-minute break and then go to 12 the end. 13 MR. MARK KLEIN: That's fine. 14 (Recess taken.) 15 (Wilson Exhibit 7 marked for 16 identification.) 17 BY MR. MARK KLEIN: 18 Q. Dr. Wilson, I show you what has 19 been marked as Wilson Exhibit 7. Please 20 take a moment to review the document 21 generally and tell me when you have done 22 so, and I'll represent to you that I have 23 inserted exhibit tabs and bound this 24 document, but, otherwise, it is what your 25 counsel served on me.</p>	<p style="text-align: right;">Page 240</p> <p>1 WILSON 2 Interrogatories were true to the best of 3 your knowledge, information, and belief, 4 right? 5 A. That's correct. 6 Q. Now, I am going to ask you a lot 7 more about this document tomorrow, but I 8 just want to ask you about Exhibit 5 to 9 this document, which is a document that is 10 1 through 52, right? It is 52 pages long? 11 A. Yes. 12 Q. This document is titled "Dr. 13 Joseph Wilson's Professional Production 14 and Seized Materials." 15 A. Yes. 16 Q. That is correct? 17 A. That's correct. That is the 18 title. 19 Q. Did you prepare this document 20 which is Exhibit 5? 21 A. Yes, I did. 22 Q. Did anybody assist you in 23 preparing this document? 24 A. No. 25 Q. How did you go about preparing</p>
<p style="text-align: right;">Page 239</p> <p>1 WILSON 2 MR. JAMES KLEIN: The copy you 3 gave me has -- did you give me your copy? 4 MR. MARK KLEIN: Yes. Thank 5 you. 6 Q. My question to you is have you 7 seen Exhibit 7 before, sir? 8 A. Exhibit 7? 9 Q. Yes, this is Exhibit 7/? 10 A. Because it says Exhibit 1, and 11 there is no 7. This is Exhibit 7. 12 Okay. I've seen this. 13 Q. And if you look at the last page 14 before Exhibit 1 of this document. That's 15 your verification? 16 A. My signature. Yes. 17 Q. Right? 18 A. Yes. 19 Q. And you signed that on December 20 20, 2018? 21 A. Correct. 22 Q. And you declared under penalty 23 of perjury that the facts stated in 24 Plaintiff's Supplemental Responses to 25 Certain of Defendants' First Set of</p>	<p style="text-align: right;">Page 241</p> <p>1 WILSON 2 this document? 3 A. By focusing on my research, my 4 work, my starting with my curriculum vitae 5 and then by reflecting carefully to the 6 extent possible to try to create in the 7 absence of a lot of documents the things 8 that I did over the years. 9 Q. Did you refer to any documents 10 in preparing this Exhibit 5? 11 A. Yes, I did. 12 Q. What documents did you refer to? 13 A. I referred to Tearing Down the 14 Color Bar. 15 Q. That is one of your books? 16 A. Yes. 17 Q. Anything else? 18 A. Yes. I referred to Black 19 Labor -- Black Labor and another book. I 20 refer to several of my books. 21 Q. Anything else that you refer to 22 besides your books? 23 A. Yes, I -- I went online to look 24 up some of the events at the worker 25 education center that I directed. For</p>

<p style="text-align: right;">Page 242</p> <p>1 WILSON 2 example, I looked up black women in the 3 radicle -- Black Women in the Radicle 4 Tradition in order to see -- to refresh my 5 memory to see who participated 6 and -- so -- and I looked at the -- there 7 is a publication called Dissertation 8 Abstracts, which lists my doctoral thesis. 9 Then I actually made some references to my 10 archival collection. I went to the -- 11 you know, scrolling online to look at 12 Black Workers and my documents, and some 13 of them are -- my archival work/, some of 14 it is cited online and then -- 15 Q. You are talking about your 16 archival work at the Schomburg Center? 17 A. Yes. My archival work at the 18 Schomburg Center, and let's see. I 19 mentioned that I looked online at the 20 International Encyclopedia of Protest and 21 Revolution. Then of course I had to, you 22 know, reconstruct and kind of 23 re -- rethink some of the collections, 24 and so that's -- that's pretty much what I 25 could think of off the top of my head.</p>	<p style="text-align: right;">Page 244</p> <p>1 WILSON 2 Q. So is that the estimate of the 3 amount of time it took you to write 4 Tearing Down the Color Bar or is that an 5 estimate of the amount of time that it 6 would take to reproduce the materials that 7 you say were seized and not returned? 8 A. That would have been a 9 combination of research and writing over a 10 period of five years. 11 Q. So is this the amount of time 12 that it would take you to reproduce what 13 was lost? 14 A. It might take longer and -- so, 15 for example, for Volume 2, it could take 16 approximately five years to do a -- or to 17 recreate this volume approximately. 18 So -- 19 Q. Again, I ask you, sir, is that 20 600 days the amount of time you estimate 21 it would take to reproduce what was lost 22 when these materials that you list here 23 were "Seized and not returned"? 24 A. Yes. So from -- 25 Q. Yes or no.</p>
<p style="text-align: right;">Page 243</p> <p>1 WILSON 2 Q. As I said, I am going to ask you 3 a lot more about this tomorrow, but I just 4 want -- if you go to page 3 of 52. 5 A. Page 3. 6 Q. Under the heading "Tearing Down 7 the Color Bar", you have a list of quote 8 "Materials seized and not returned." Do 9 you see that? 10 A. Yes, I do. 11 Q. And then you say "Statement 12 labor times" and you say 600 days over 13 five years? 14 A. Right. 15 Q. That is 600 days to do what? 16 A. Well, that is to -- to do the 17 historical research, the documentation, 18 the annotation, the writing of the 19 manuscript, and then editing of the 20 manuscript, and, you know, finding graphic 21 illustrations, and, you know, looking at 22 the various letters, correspondence, my 23 notes. So that -- that took 24 approximately that amount of time as a 25 conservative estimate, but yes.</p>	<p style="text-align: right;">Page 245</p> <p>1 WILSON 2 A. Yes. Yes. 3 Q. Okay. All right. We will 4 come back to that tomorrow. 5 A. Uh-huh. 6 MR. MARK KLEIN: I am going to 7 ask the reporter to mark as Wilson Exhibit 8 a document bearing the stamps -- 9 A. So actually let me -- 10 Q. Wait. 11 A. Let me clarify one point. 12 So just for your edification, 13 research is done in stages, so there was a 14 preliminary stage that was required that 15 took a separate amount of time and 16 separate work, and without the preliminary 17 stage I couldn't have done this. So we 18 could talk about that tomorrow, but this 19 wouldn't have been everything related -- 20 This was the writing and the production 21 and research and footnoting and writing 22 out the manuscript, but there was a series 23 of presteps before I could get to the 24 actual writing of the manuscript. So 25 that's -- I just wanted to clarify that.</p>

<p>1 WILSON 2 Q. Okay. But again that 600 hours 3 is the amount of time it would take to 4 recreate all those materials? 5 A. Not 600 hours. I didn't say 6 hours. 7 Q. 600 -- 8 A. Days. 9 Q. 600 days to recreate what was 10 lost when those materials were "Seized and 11 not returned"? 12 A. Approximately. Yes. 13 Q. Okay. 14 MR. MARK KLEIN: I am going to 15 ask the reporter to mark as Wilson Exhibit 16 8 a document bearing stamps -- well, I see 17 that in the copying the Bates stamps got 18 removed, but on the original I have the 19 documents were Bates stamped DEF 000571 20 through 590. 21 (Wilson Exhibit 8 marked for 22 identification.) 23 (Document handed to witness.) 24 Q. Dr. Wilson, I hand you what has 25 been marked as Exhibit 8, and my question,</p>	<p>Page 246</p> <p>1 WILSON 2 understanding is that research is an 3 expectation of employment, and that is not 4 a reportable activity. 5 Q. If you were being paid in 6 addition to your salary for research, were 7 you required to report that on a multiple 8 position report? 9 A. I don't think so. 10 Q. And what is that based on? 11 A. That research -- well, that 12 research is an expectation whether it is 13 paid or unpaid because, for example, 14 I -- you publish a book, and you get 15 royalties. They don't ask you for a 16 royalty report or publication report 17 like -- in terms of your remuneration. So 18 my understanding after all of these years 19 on the faculty is no, that is not a 20 requirement. 21 MR. JAMES KLEIN: Well, you 22 know, is there a time element? I mean 23 there is no -- I am not certain that what 24 might be standard practice today regarding 25 multiple position reports is the same</p>
<p>1 WILSON 2 sir, is whether you have seen these pages 3 before? 4 A. Yes. 5 Q. And what are they? 6 A. This is called the Multiple 7 Position Form, Brooklyn College. 8 Q. And these are multiple position 9 reports that you filled out and signed at 10 various times while you were employed at 11 Brooklyn College; is that right? 12 A. That's correct. 13 Q. And do you recall that this was 14 an exhibit at the arbitration where you 15 were represented by Pete Zwiebach? 16 A. I do. 17 Q. And what is your understanding, 18 if any, of when you're required -- when 19 you were required to fill out a multiple 20 position report while you were employed at 21 Brooklyn College? 22 A. My understanding is in the first 23 place that research is excluded from 24 multiple position reporting, as I wasn't 25 being paid, but even if I was my</p>	<p>Page 247</p> <p>1 WILSON 2 practice -- 3 MR. MARK KLEIN: I am not 4 asking -- 5 MR. JAMES KLEIN: You are 6 asking if something was required. Was it 7 required from 1990 when he was a professor 8 was it required in 1992 when he was a 9 professor? Was it required in 1997 when 10 he was professor? I mean policies change 11 over time, and they change depending on 12 the context of what position. So an open 13 ended question of what is required is sort 14 of an unanswerable question. 15 MR. MARK KLEIN: I ask the 16 reporter to mark as Wilson Exhibit 9 17 documents bearing Bates stamps DEF 196 18 through 210. 19 (Wilson Exhibit 9 marked for 20 identification.) 21 (Document handed to witness.) 22 Q. Dr. Wilson, I show you what has 23 been marked as Wilson Exhibit 9. Please 24 take a moment to review that. I am not 25 going to ask you about specifics at least</p>

<p style="text-align: right;">Page 250</p> <p>1 WILSON 2 not now, but tell me whether you have seen 3 this before? 4 A. I don't recall seeing this. 5 Q. Do you have any recollection of 6 whether this was Exhibit 107 A at the 7 arbitration at which you were represented 8 by Pete Zwiebach? 9 A. I don't remember, but I see the 10 marking on the top. 11 Q. Do you recall seeing multiple 12 position policies for Brooklyn College 13 effective in the 2010 to 2011 time period? 14 A. I do. 15 Q. Do you recognize that these are 16 Brooklyn College's multiple position 17 policies during that time period? 18 A. I would have to look at it more 19 carefully because they have changed over 20 several occasions from when I started to 21 this period, so I would have to read it 22 again. 23 Q. Well, if you look at the fifth 24 page of the document. 25 A. Of which document?</p>	<p style="text-align: right;">Page 252</p> <p>1 WILSON 2 Q. And if you go to page 4 under 3 the heading City University of New York 4 Multiple Position Policy Manual. 5 A. Yes. 6 Q. Also at policy 5.14 multiple 7 positions, and the document says it was 8 retrieved from the website on April 5, 9 2011. Do see that, sir? 10 A. I do. 11 Q. Okay. Now, does this refresh 12 your recollection that these were the 13 Multiple Position Policy for Brooklyn 14 College during the time period 2009 to 15 2012 when you were employed at Brooklyn 16 College? 17 A. I would have to look at it more 18 carefully, but I guess that is -- I guess 19 that is what it was. 20 Q. Do you recall seeing the 21 Multiple Position Policy for Brooklyn 22 College while you were a professor there? 23 A. Not like this. Not in this 24 form, no. 25 Q. Is it your testimony that this</p>
<p style="text-align: right;">Page 251</p> <p>1 WILSON 2 Q. The one you are looking at. 3 A. There is no page numbers on 4 this. 5 Q. I know. So go to the fifth 6 page, please. Do you see at the bottom 7 right-hand portion of the page it says 8 "Approved by CUNY Board of Trustees on 9 February 26, 2017"? 10 A. Yes, I see that. 11 Q. Does that refresh your 12 recollection that the -- that this policy 13 was in effect while you worked at Brooklyn 14 College? 15 A. Well, apparently it was. I 16 can't say it refreshes my recollection. 17 Q. And if you go to the page that 18 has a Bates stamp DEF 204. 19 A. Yes. 20 Q. Do you see that it says page 1 21 of 2 at the bottom revised 4/2011? Do you 22 see that? 23 A. Yes. Okay. 24 Q. Revised April, 4/2011, right? 25 A. Yes.</p>	<p style="text-align: right;">Page 253</p> <p>1 WILSON 2 is not the Multiple Position Policy that 3 was in effect from 2009 to 2012? 4 A. That is not my testimony. My 5 testimony is I didn't see it in this 6 format. We were given a -- this, not the 7 policy. This is what we were given, the 8 multi position form, not the multiple 9 position manual. 10 Q. So is it your testimony that you 11 didn't look at the Multiple Position 12 Policy as set forth in the Brooklyn 13 College manual -- 14 A. Yes -- 15 Q. -- while you were a professor 16 there? 17 A. Correct. 18 Q. And you didn't have access to 19 it. Is that your testimony? 20 A. I didn't say that I didn't have 21 access. I was unaware of it. 22 Q. How long were you a professor at 23 Brooklyn College? 24 A. About 30 years. 25 Q. And it is your testimony that</p>

<p style="text-align: right;">Page 254</p> <p>1 WILSON 2 you weren't aware of the Multiple Position 3 Policy? 4 A. This was the only Multiple 5 Position Form I ever received, and this 6 wasn't even -- this is evolved, but yes, I 7 never received a policy. 8 MR. MARK KLEIN: I am going to 9 ask that the reporter mark as Wilson 10 Exhibit 10 -- 11 A. That I can remember. 12 Q. Okay. 13 MR. MARK KLEIN: -- Wilson 10 a 14 document bearing the Bates stamp DEF 15 000211 through 216. 16 (Wilson Exhibit 10 marked for 17 identification.) 18 (Document handed to witness.) 19 Q. Dr. Wilson, I show you what has 20 been marked as Wilson Exhibit 10. Please 21 take a moment to review the document. 22 (Pause.) 23 Q. Tell me when you have done so. 24 A. Yes. 25 Q. These are a series of e-mails</p>	<p style="text-align: right;">Page 256</p> <p>1 WILSON 2 Exhibit 10? 3 A. Yes. No, not the specific 4 e-mails. I know it was the policy to 5 remind faculty, and I was very diligent 6 about filling out my Multiple Position 7 Form. That is what I did. 8 Q. Well, let's look at the first 9 page of Exhibit 10. It is an e-mail from 10 James Eaton to you dated October 14 of 11 2008, right? 12 A. Right. 13 Q. And the first sentence of the 14 e-mail says after "Dear Professor Wilson, 15 we have not received your completed 16 multiple" -- let me try again. 17 "We have not received your 18 completed multiple position report for 19 this semester." Correct? 20 A. That's correct. 21 Q. And so he was reminding you that 22 you hadn't submitted your multiple 23 position report for that semester yet, 24 right? 25 A. That is not right.</p>
<p style="text-align: right;">Page 255</p> <p>1 WILSON 2 from James Eaton at Brooklyn College to 3 you; is that correct? 4 A. Correct. 5 Q. And they run from the period of 6 October of 2008 through February of 2012, 7 right? 8 A. Correct. 9 Q. And this was an exhibit at your 10 arbitration at which you were represented 11 by Mr. Zwiebach, correct? 12 A. Correct. 13 Q. Do you recall seeing this 14 exhibit during the course of the 15 arbitration? 16 A. No, not the specific exhibit. 17 Q. Do you recall receiving any of 18 these e-mails from James Eaton? 19 A. I received -- I recall receiving 20 e-mails about reminders for multiple 21 positions, and those e-mails were always 22 associated with a hardcopy that we filled 23 out, so I -- that is my recollection. 24 Q. Do you recall receiving any of 25 the e-mails that have been marked as</p>	<p style="text-align: right;">Page 257</p> <p>1 WILSON 2 Q. What is inaccurate about this? 3 A. I happen to remember that I 4 submitted it three times, and the 5 departmental secretary at that time lost 6 it three times because we don't submit it 7 to Eaton. We submit it to our 8 departmental secretaries. At first we 9 discuss it with the chair, and then we 10 submit it to the secretary, and I remember 11 on a couple of occasions -- her name was 12 Maria Corazone. I am not sure of the 13 precise spelling of her name. Maybe it is 14 Corazone, and I remember being flummoxed 15 not just me but other people that they 16 repeatedly lost our Multiple Position 17 Forms. So -- 18 Q. If you look at Exhibit 10, there 19 are reminders that you hadn't submitted 20 your form for each of 2008, 2009, 2010, 21 2011, and 2012, correct? 22 A. Right. 23 Q. And is it your testimony that 24 the departmental secretary lost the multi 25 position report that you had prepared and</p>

<p style="text-align: right;">Page 258</p> <p>1 WILSON 2 submitted each and every time that you had 3 gotten a reminder? 4 A. At least a couple of times. Not 5 necessarily each and every time. 6 Q. Look at just the first page of 7 Exhibit 10. You will see in the middle of 8 Mr. Eaton's e-mail he says, "The form, the 9 instructions, and the related policies are 10 available via the links below." Do you 11 see that? 12 A. Yes. 13 Q. So he was telling you exactly 14 where you could go on the website to find 15 the Multiple Position Form and the 16 instructions and the policies, correct? 17 A. That's correct. 18 Q. And it is your testimony you 19 never looked at the instructions and the 20 policies? 21 A. Well, I only really looked at 22 the Multiple Position Form. My 23 understanding was this spelled out the 24 specific policies. This -- 25 Q. Could you answer my question,</p>	<p style="text-align: right;">Page 260</p> <p>1 WILSON 2 A. So what were the years you said 3 now? 4 Q. Let's just focus on from 2009 to 5 2011. So if you will go to DEF 000583 to 6 the end. 7 MR. JAMES KLEIN: My copy isn't 8 Bates stamped, so I don't know where you 9 are. 10 MR. MARK KLEIN: I apologize 11 for that. As I said, in the copying the 12 Bates stamps -- 13 MR. JAMES KLEIN: Is his Bates 14 stamped? 15 A. I don't see -- 16 MR. JAMES KLEIN: Does it have a 17 number on it? No, it doesn't. 18 MR. MARK KLEIN: Okay. That's 19 unfortunate. 20 Q. If you go to the eighth page 21 from the end -- 22 MR. JAMES KLEIN: From the end? 23 MR. MARK KLEIN: From the back. 24 Q. So the eighth page from the back 25 is the multiple position report from fall</p>
<p style="text-align: right;">Page 259</p> <p>1 WILSON 2 sir. Is it your testimony you never 3 looked at the instructions and the 4 policies relating to the Multiple Position 5 Form while you were a professor at 6 Brooklyn College for 30 years? 7 A. That is not correct. What I 8 said was I looked at instructions and 9 policies on the multiple position form 10 itself. I didn't look at a manual. 11 Correct. 12 Q. Now, is Exhibit 8 a copy of all 13 the multiple position forms you submitted 14 between the spring of 2005 and the fall of 15 2011? 16 A. I don't think so. 17 Q. Do you believe you submitted 18 multiple position forms in addition to the 19 ones that are collected as part of Exhibit 20 8? 21 A. I haven't had a chance to see if 22 every year that you are mentioning, you 23 know -- I haven't looked at this really, 24 so I don't know precisely. 25 Q. Take a moment and look at it.</p>	<p style="text-align: right;">Page 261</p> <p>1 WILSON 2 of 2009; correct? 3 A. That's correct. 4 Q. And that is your signatures at 5 about the middle of the page? 6 A. At the bottom. 7 Q. And the date next to your 8 signature is September 9, 2009? 9 A. That's right. 10 Q. Now, after that there is a 11 multiple position report for the fall of 12 2010, correct? 13 A. You mean on the next page? 14 Q. No, two pages. 15 A. Yes. 16 Q. And if you go four pages more 17 there is a multiple position report for 18 the fall of 2011, correct? 19 A. The fall -- right. 20 Q. So the one in the fall of 2011 21 you signed electronically as indicated at 22 the bottom of the page, correct? 23 A. Right. 24 Q. So included here in this exhibit 25 were three multiple position reports that</p>

<p style="text-align: right;">Page 262</p> <p>1 WILSON 2 you submitted for the fall of 2009, the 3 fall 2010, and the fall of 2011, correct? 4 A. Correct. 5 Q. Are you aware of any other 6 multiple position forms that you submitted 7 during the time period fall of 2009 8 through fall of 2011? 9 A. As I said, there were multiple 10 position forms that I submitted that I had 11 to resubmit on numerous occasions because 12 the secretary lost them. So yes, there 13 were other multiple position forms that I 14 submitted to the department that weren't 15 submitted to the provost. 16 Q. And how do you know that? 17 A. Because the chair told me at 18 that time. 19 Q. Who was the chair? 20 A. Sally Bermanson. 21 Q. Did you keep a copy of multiple 22 position reports that you filled out? 23 A. Yes, I kept copies. 24 Q. Where did you keep those copies? 25 A. In my office in Brooklyn</p>	<p style="text-align: right;">Page 264</p> <p>1 WILSON 2 Teachers Project? 3 A. That was a project to recruit 4 and support and provide scholarships and 5 mentorship to African American men to 6 encourage their participation in teaching 7 at Brooklyn College. Essentially 8 under -- making sure that undergraduate 9 men -- I am actually trying to remember. 10 I think it was both undergraduate and 11 graduate. I would have to refresh my 12 recollection on that, but we worked with 13 African American men to maintain their 14 GPAs, to give them scholarships to make 15 sure that they would enter the teaching 16 profession. 17 Q. And what did you personally 18 do -- 19 MR. MARK KLEIN: Withdrawn. 20 Q. How long did you work as a 21 coprincipal investigator with respect to 22 the Urban Community Teachers Project? 23 A. Approximately a couple of years. 24 Q. What years? 25 A. Maybe 2009 through 2011.</p>
<p style="text-align: right;">Page 263</p> <p>1 WILSON 2 College. 3 Q. And those multiple position 4 reports are among the documents that you 5 didn't get back. Is that what your 6 testimony is? 7 A. That's correct. 8 Q. Are you familiar with something 9 called the Deutsche Bank Foundation? 10 A. Yes. 11 Q. What was the Deutsche Bank 12 Foundation? 13 A. It was a foundation that 14 provided funding for one of the programs 15 that I was a principal investigator on, 16 coprincipal investigator. 17 Q. And what is a principal 18 investigator? 19 A. One who is leading an aspect or 20 a research project. 21 Q. And what was that project on 22 which you were a coprincipal investigator? 23 A. I believe that was the Urban 24 Community Teachers Program or project. 25 Q. And what was the Urban Community</p>	<p style="text-align: right;">Page 265</p> <p>1 WILSON 2 Q. Now, you just testified that the 3 Deutsche Bank Foundation was a donor in 4 connection with that project? 5 A. That's correct. 6 Q. And was there -- are you 7 familiar with something called the Schott, 8 S-C-H-O-T-T, Foundation? 9 A. Schott Foundation. 10 Q. And was the Schott Foundation 11 also a donor in connection with the Urban 12 Community Teacher Project? 13 A. Yes. 14 Q. And who is the other principal 15 investigator besides yourself? 16 A. Noel Anderson, Professor 17 Anderson. 18 Q. Now, did you or anyone on your 19 behalf make requests for payments from the 20 Schott Foundation in connection with 21 administrative support that you did for 22 the Urban Community Teacher Project? 23 A. Not from the Schott Foundation, 24 from the Brooklyn College Foundation. 25 Q. Okay. Was the account named</p>

<p>1 WILSON 2 the Schott Foundation? 3 A. I don't recall the name of the 4 account. 5 Q. The funds were housed at the 6 Brooklyn College Foundation? 7 A. That is my understanding. 8 Q. So you or someone on your behalf 9 made a request for payment from the 10 Brooklyn College Foundation for 11 administrative support you provided for 12 Urban Community Teachers Project? 13 A. No, not simply. The Brooklyn 14 College Foundation as well as college 15 administration and the School of Education 16 reviewed the application, and I think 17 for -- so we didn't apply as individuals. 18 So everything was reviewed by the college 19 and by the Brooklyn College Foundation as 20 well as by human resources, and everything 21 was approved including whatever terms of 22 payment that we were supposed to receive 23 was approved in advance of us receiving 24 any funding. 25 Q. Okay. But a request was made</p> <p>1 WILSON 2 for a check payable to you from the 3 Brooklyn College Foundation the purpose 4 for which was to pay you for 5 administrative support you provided for 6 the Urban Community Teachers Program; is 7 that right? 8 A. That's correct. 9 MR. MARK KLEIN: I am going to 10 ask the reporter to mark as Exhibit 11 a 11 document bearing Bates Stamps DEF 00546 12 through 5553. 13 (Wilson Exhibit 11 marked for 14 identification.) 15 (Document handed to witness.) 16 Q. Dr. Wilson, I show you what has 17 been marked as Exhibit 11 in this 18 deposition. If you could look at that, 19 please, sir. 20 A. Uh-huh. 21 Q. Can you tell me what Exhibit 11 22 is? 23 A. This is a payment request 24 from -- to the account Schott Foundation 25 and a check payable to Joseph Wilson.</p>	<p>Page 266</p> <p>1 WILSON 2 Q. Actually it is a series of 3 payment requests, is it not? 4 A. Yes, it is a series. 5 Q. And these requests were requests 6 that were made for payment to you for 7 administrative support for the UCT 8 program, correct? 9 A. That's correct. 10 Q. And this document was -- you saw 11 this during the course of your arbitration 12 in which you were represented by Mr. 13 Zwiebach, correct? 14 A. Yes. 15 Q. This was -- it is written at the 16 top CUNY 29, Exhibit 29, right? 17 A. Correct. 18 Q. Now, as a result of these 19 payment requests you received a payment of 20 \$5,000 in June of 2010, correct? 21 A. That's correct. 22 Q. And you received two 5,000 23 dollar payments in -- 24 MR. MARK KLEIN: Withdrawn. 25 Q. And you received a payment of</p> <p>Page 267</p> <p>1 WILSON 2 5,000 in August of 2010, right? 3 A. That's correct. 4 Q. And another payment of 5,000 in 5 October of 2010, right? 6 A. That's correct. 7 MR. MARK KLEIN: I ask that the 8 reporter mark as Wilson 12 a document 9 bearing Bates stamps DEF 00546 through 10 553. 11 (Wilson Exhibit 12 marked for 12 identification.) 13 (Document handed to witness.) 14 Q. Dr. Wilson, I show you what has 15 been marked as Exhibit 12. Please take a 16 moment to review that document. My first 17 question is whether you have seen it 18 before? 19 A. I couldn't recall seeing it, but 20 I see CUNY 30. 21 Q. Do you recall whether this was 22 an exhibit at the arbitration in which you 23 were represented by Mr. Zwiebach? 24 A. I don't recall specifically, no. 25 MR. JAMES KLEIN: Are these</p>
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<p style="text-align: right;">Page 270</p> <p>1 WILSON 2 numbers in the upper right-hand corner the 3 exhibit numbers from the arbitration? 4 MR. MARK KLEIN: Yes, they 5 didn't have tabs. They apparently just 6 wrote numbers. 7 A. Let me -- I have to stop you 8 because I remember specifically indicating 9 Urban Community Teachers on my Multiple 10 Position Form and BMI, and I don't see any 11 reference to those, so these documents are 12 not complete. I absolutely mentioned 13 Urban Community Teachers and the amount of 14 payment and so forth. 15 Q. Did you disclose the payment you 16 received from the -- for the 17 administrative work you did in the amount 18 of \$5,000 on your Multiple Position Form 19 with respect to the payment you got in the 20 spring of 2010? 21 A. That's my recollection, yes. 22 Q. It is your testimony that you 23 disclosed on your multiple position report 24 for the spring of 2010 payment of \$5,000? 25 A. My point is I see nothing here</p>	<p style="text-align: right;">Page 272</p> <p>1 WILSON 2 A. It doesn't call for disclosure. 3 It asks whether you received -- what work 4 you did in that current semester, annual 5 report of activities that are not part of 6 your regular full time. 7 Q. So it is -- 8 A. So that was -- 9 Q. So it is not disclosed on that 10 form that you received \$10,000? 11 A. The form doesn't ask for that. 12 So yes. 13 Q. Do you recall testifying at the 14 arbitration regarding -- 15 MR. JAMES KLEIN: Can you 16 identify the place on the form where it 17 should be disclosed? 18 MR. MARK KLEIN: I am not 19 testifying here. 20 MR. JAMES KLEIN: I mean you 21 are saying that it is not disclosed on a 22 form where it doesn't ask for it to be 23 disclosed, and you're making a leap that 24 there is no basis for. 25 MR. MARK KLEIN: Okay.</p>
<p style="text-align: right;">Page 271</p> <p>1 WILSON 2 that mentions UCT or BMI, and I know 3 specifically that those were mentioned, 4 and so I see what amounts were mentioned, 5 but the hours were mentioned here. Yes. 6 Here. Here it is on page -- there is no 7 page here. Here you go. Look. It says 8 90 hours of work, and it doesn't ask for 9 the compensation amount, but it asks 10 whether you did the work. That's without 11 looking at it carefully. 12 Q. You are looking at a form for 13 2007, are you not, sir? 14 A. Yes. 15 Q. Okay. So with respect to the 16 form you submitted for the fall of 2010, 17 could you find that form? 18 A. I see it. 19 Q. And in the fall of 2010, you 20 just testified that you received \$10,000 21 for the work you did for the Urban 22 Community Teachers Project, correct? 23 A. Correct. 24 Q. Is it disclosed on that form the 25 fact that you got \$10,000 for that work?</p>	<p style="text-align: right;">Page 273</p> <p>1 WILSON 2 Q. If you could go to the form for 3 fall of 2010, Dr. Wilson? 4 A. Is that this form where it says 5 Brooklyn College ERIS at the top where I 6 list my activities. 7 Q. Let's start two pages 8 beforehand. 9 A. Okay. 10 Q. And you signed that form on 11 September 14, 2010, correct? 12 A. Correct. 13 Q. And under B a little more than 14 half way down the page it says, "I am 15 aware of the multiple position regulations 16 governing activities in addition to my 17 regular full-time employment at Brooklyn 18 College CUNY." 19 Do you see that? 20 A. I see that. 21 Q. And then you checked the box 22 that says, "In addition to my regular 23 full-time assignment at the college I have 24 supplementary employment, consultative or 25 other work for extra compensation</p>

<p>1 WILSON 2 including grant-funded activities within 3 CUNY for which complete information 4 follows." Do you see that? 5 A. I see that. 6 Q. And then it says "If you check 7 this statement, complete Section B 1." 8 A. B 1. 9 Q. Right. 10 A. Right. 11 Q. Now, if you go two pages 12 further, do you see B 1? 13 A. I do. 14 Q. And it says "for current 15 semester." 16 A. Yes. 17 Q. And it discloses eight hours a 18 week, correct? 19 A. That's correct. 20 Q. And eight hours a week of \$64.23 21 an hour -- I am sorry eight hours a week 22 at \$63.24, correct? 23 A. I don't know. Where do you see 24 \$64.23? 25 Q. Actually if you look at the page</p>	<p>Page 274</p> <p>1 WILSON 2 A. Yes, that's correct. 3 Q. And the \$10,000 is not disclosed 4 on this form in any way, is it? Yes or 5 no? 6 A. No, that is not true. That is 7 not correct because the -- first of all, 8 you see \$8,220, so that would have 9 constituted some of the 10,000. 10 A. But the 10,000 didn't 11 necessarily reflect that particular 12 semester. It could have been two months 13 over into the following semester. It 14 could have been two months into the 15 previous semester. They didn't pay you 16 in advance. You do the work, and then 17 they pay you, and I disclosed it. 18 Q. Now, you testified at your 19 arbitration that you got \$5,000 in 20 connection with the work you did for Urban 21 Community Teachers Project in the spring 22 of 2010, the following semester, right? 23 Right? 24 A. I don't know. If that's what 25 you have a report of, but yes.</p>
<p>1 WILSON 2 before we are looking at before. 3 A. Page B 4. 4 MR. JAMES KLEIN: No, looking 5 at -- 6 Q. The previous page. 7 MR. JAMES KLEIN: The previous 8 page before that. 9 A. Okay. 10 Q. Do you see a form that is titled 11 "Instructional Staff Appointment 12 Information"?" 13 A. Yes. 14 Q. And three quarters or more down 15 the page it reflects an hourly rate of 16 \$64.23 for non-teaching time, right? 17 A. Right. 18 Q. For a total of \$8,221.44? 19 A. I see that. 20 Q. Okay. Now, you testified a 21 little while ago that you received a total 22 of \$10,000 in the fall of 2010 in 23 connection with your "Administrative 24 support for the Urban Community Teachers 25 Program," right?</p>	<p>Page 275</p> <p>1 WILSON 2 Q. I'll show you your testimony in 3 a minute, but do you recall testifying to 4 that? 5 A. No, I don't recall testifying to 6 that. 7 Q. Do you remember testifying that 8 you disclosed the receipt of the 9 \$5,000 -- 10 A. Yes. 11 Q. -- in the spring of 2010 on your 12 Multiple Position Form for spring of 2010? 13 A. I accept that I said it. I 14 don't specifically recall it, but I accept 15 that I said it. 16 Q. But you also testified that 17 you didn't see on the Multiple Position 18 Form for the fall of 2010 disclosure of 19 the \$10,000 you received during that 20 semester, correct? 21 A. It -- the issue is not when I 22 received the money. The issue is what 23 did the money reflect over a period of 24 months that I worked, so it is not -- it 25 is not when you get paid. It is for what</p>

<p>1 WILSON 2 period does it cover. There is two 3 different questions there. 4 MR. MARK KLEIN: I am going to 5 ask the reporter to mark as Wilson Exhibit 6 13 a document bearing Bates stamps DEF 143 7 through 171. 8 (Wilson Exhibit 13 marked for 9 identification.) 10 (Document handed to witness.) 11 A. I would also point out that this 12 is -- 13 Q. Theres no pending question, sir? 14 A. What? 15 Q. There is no pending question. 16 A. Okay. 17 MR. JAMES KLEIN: Would you 18 like to change one of your previous 19 answers? 20 THE WITNESS: Yes. 21 Q. You want to change one of your 22 previous answers. Go ahead/? 23 A. Yes. This form was submitted 24 by my assistant, not by me. So it's quite 25 possible that she was off by a few hundred</p> <p>1 WILSON 2 dollars. There could have been some 3 confusion, but certainly there was nothing 4 intentional between the 10,000 that you 5 mentioned and the 8200 and change that she 6 mentioned, and then the issue of the time 7 lag between when you did it and when you 8 get paid and does it straddle one semester 9 and another semester. So it is pretty 10 complicated, and it is very easy to make a 11 mistake, but that is the point. 12 Q. Have you finished changing your 13 answer, sir? 14 A. I am finished, yes. 15 Q. Okay. I would like to show you 16 what has been marked as Exhibit 13, sir. 17 That is Volume 10 from the arbitration on 18 which you were represented by Mr. 19 Zwiebach, correct? 20 A. That's correct. 21 Q. And do you recall reviewing this 22 transcript before? 23 A. I don't recall reviewing this, 24 no. 25 Q. Let me direct your attention to</p>	<p>Page 278</p> <p>1 WILSON 2 page 26 of Exhibit 13. 3 A. Page 26. 4 Q. If you see the page numbers in 5 the lower right-hand corner. 6 A. 13 -- no, page 10. Okay. 7 Q. I got it. 8 A. Page 26. 9 Q. All right. Now, starting on 10 page 1392 of the transcript, line 6, 11 Ms. Nash, you know who -- 12 MR. JAMES KLEIN: Can you give 13 me the page number again, please. 14 MR. MARK KLEIN: Page 1392. 15 MR. JAMES KLEIN: Yes, line 6. 16 Q. Line 6, Ms. Nash, Rachel Nash 17 who represented CUNY at the arbitration. 18 A. Yes. 19 Q. And Mr. Zwiebach was your 20 attorney, right? 21 A. Not my attorney. The union's 22 attorney. 23 Q. Okay. He was representing you, 24 right? 25 A. Correct.</p> <p>Page 279</p> <p>1 WILSON 2 Q. Okay. So Ms. Nash said, I am 3 going to have to ask you to give him 4 Exhibit 32 again, and exhibit 32 was the 5 multiple position forms, correct? 6 A. Yes. 7 Q. And we marked that as Wilson 8 Exhibit 8 here today, correct? 9 A. Correct. 10 Q. And then she says: "Question: 11 Can you please turn to the fall of 2010 12 Multiple Position Form. Turn to the 13 second page of that form, please. 14 "Answer -- 15 A. You are asking me to. 16 Q. I am reading what is written 17 here. 18 A. Okay. 19 Q. "Question: You indicated eight 20 hours a week for ERIS, right? 21 "Answer: Right. 22 "Question: And that is for 23 September to December 2010, right? 24 "Answer: Right. 25 "Question: And if you turn to</p>
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<p style="text-align: right;">Page 282</p> <p>1 WILSON 2 the next page, that is an important -- an 3 appointment form, right?" 4 A. Hold on. You lost me. The 5 next page meaning -- Okay. 6 Q. I am just reading what is typed 7 here. 8 A. Yes, I know. 9 MR. JAMES KLEIN: When she says 10 next page in the transcript, she is 11 referring to the multiple position report. 12 Q. She is referring to the first 13 page of Exhibit 32. 14 MR. JAMES KLEIN: The fall 2010 15 multiple position report. 16 Q. So I will repeat that. 17 "Question: And if you turn to 18 the next page, that is an appointment 19 form, right? 20 "Answer: Nonteaching adjunct 21 appointment, yes." And by the way where 22 ever it says answer A, that is what you 23 testified to, correct? 24 A. Correct. 25 Q. "Question: And it is for</p>	<p style="text-align: right;">Page 284</p> <p>1 WILSON 2 "Answer: I don't know. 3 "Question: And that is for UCT, 4 right? 5 "Answer: That's correct. 6 "Question: So in fact you did 7 not disclose your UCT payments on your 8 multiple position forms, did you? 9 "Answer: I don't see it here. 10 "Question: Now, you've got 11 5,000 from the Schott Foundation in the 12 spring of 2010. Do you recall that? 13 "Answer: Yes. 14 "Question: We actually don't 15 have your spring 2010 form. It's your 16 position that you disclosed that on your 17 spring 2010 form? 18 "Answer: I believe so, yes. 19 "Question: But not on your 2010 20 form. 21 "Answer: Apparently not." 22 Dr. Wilson, did you give those 23 answers to those questions at your 24 arbitration on June 19, 2015? 25 A. Yes.</p>
<p style="text-align: right;">Page 283</p> <p>1 WILSON 2 September 2010 to December 2010 you see 3 down about three quarters of the way down? 4 "Answer: Yes. 5 "Question: It says your hourly 6 rate is \$60 an hour, right? 7 "Answer: Right. 8 "Question: And it lists a total 9 of 128 hours, right? 10 "Answer: That's right. 11 "Question: For \$8,221, right? 12 "Answer: Correct. 13 "Question: And that corresponds 14 to the eight hours a week that you 15 disclosed on your Multiple Position Form, 16 right? 17 "Answer: I think so. Yes. 18 Yes. That is right. 19 "Question: Now, in the fall of 20 2010, you also got \$10,000 from the Schott 21 Foundation grant, didn't you?" 22 And then going up to the top of 23 page 1394 "Answer: Yes. 24 "Question: How was that 25 disclosed on this form?</p>	<p style="text-align: right;">Page 285</p> <p>1 WILSON 2 Q. By the way, there was a 3 reference to ERIS, E-R-I-S, right, in the 4 testimony we just read? 5 A. In this testimony? 6 Q. Yes. 7 A. The arbitration, yes. 8 Q. And what was ERIS? 9 A. It was the Black Male Initiative 10 Program at Brooklyn College. 11 Q. And that was the acronym, all 12 capital letters ERIS? 13 A. Yes. 14 Q. What did ERIS stand for? 15 A. I would have to refresh my 16 memory on that, Empower Respect Initiative 17 Empower respect improve -- I have to go 18 back over the acronym. 19 MR. MARK KLEIN: I am going to 20 ask the reporter to mark as Wilson Exhibit 21 14 a document bearing Bates stamps DEF 22 00650 and 651. 23 (Wilson Exhibit 14 marked for 24 identification.) 25 (Document handed to witness.)</p>

<p style="text-align: right;">Page 286</p> <p>1 WILSON 2 Q. Dr. Wilson, I show you what has 3 been marked as Wilson Exhibit 14. Please 4 take a moment to review this and tell me 5 when you have done so. 6 (Pause.) 7 A. Yes, I see that. 8 Q. It is two pages. Have you 9 reviewed both pages? 10 A. Yes, I see that. 11 Q. Do you recall seeing this series 12 of e-mails, this e-mail chain? 13 A. I see that I received them. I 14 actually don't recall them, but I see that 15 I received them. 16 Q. Do you recall this was an 17 exhibit at your arbitration at which you 18 were represented by Mr. Zwiebach? 19 A. I do vaguely, but not really 20 actually I have to say. 21 Q. This e-mail chain relates to a 22 check for a \$150,000 from the Deutsche 23 Bank Americas Foundation for a one-year 24 grant for the UCT program, correct? 25 A. Yes.</p>	<p style="text-align: right;">Page 288</p> <p>1 WILSON 2 approved by the School of Education, so -- 3 Q. Did you ever -- 4 A. So it may not have been in this 5 letter, but it was known by the college. 6 Q. Did you ever disclose to anyone 7 that you were receiving monies from the 8 Brooklyn Foundation bank account that 9 housed the 150,000 dollar grant? 10 A. I couldn't have been paid 11 without the college drawing up contracts 12 and approving including the top financial 13 officers who approved it and the president 14 and the provost who would review it. So 15 yes, so I didn't have to disclose it. 16 They knew it in advance, and they approved 17 it. 18 Q. Now, in response to the second 19 page is an e-mail from Stephanie Ehrlich 20 to Noah Anderson, Emily Gavel, and you, 21 correct? 22 A. Correct. 23 Q. And on the first page Mr. 24 Anderson responds to Stephanie Ehrlich's 25 e-mail, right?</p>
<p style="text-align: right;">Page 287</p> <p>1 WILSON 2 Q. And who is Stephanie Ehrlich, 3 E-H-R-L-I-C-H? 4 A. I believe she worked with the 5 Brooklyn College Foundation as a grant 6 administrator, you know, with knowledge 7 and expertise in these areas. That is my 8 recollection. I am not sure if I ever 9 met her. Maybe I did. I don't know. 10 Q. And Ms. Ehrlich is asking some 11 questions of Mr. Anderson regarding how 12 the Deutsche Bank Foundation check is 13 going to be spent, right? 14 A. That's correct. 15 Q. And do you see anywhere in Mr. 16 Anderson's response to Ms. Ehrlich that he 17 mentions that you and he would be a 18 recipient of the funds that were part of 19 the 150,000 dollar grant from the Deutsche 20 Bank Americas Foundation? 21 A. My understanding is it wouldn't 22 necessarily be in this letter, but it 23 would have been in the administrative 24 category of the foundation application 25 that was approved by the college and</p>	<p style="text-align: right;">Page 289</p> <p>1 WILSON 2 A. On the first page he 3 responds -- you mean on the second page? 4 Q. No. The first page of Exhibit 5 14 contains an e-mail from Mr. Anderson to 6 Stephanie Ehrlich? 7 A. Yes, I see it. 8 Q. This was sent on Tuesday, August 9 23, 2011 at 18:53 military time? 10 A. I see that. Yes. 11 Q. And then you respond to Mr. 12 Anderson at the top of the first page, 13 right? 14 A. Yes. 15 Q. And you wrote you roll'in G," 16 R-O-L-L 'I-N G dash "money," M-O-N-E-Y? 17 A. Correct. 18 Q. What do you mean when you wrote 19 you roll'in G-money? 20 A. Essentially congratulations. 21 You are doing great work for getting the 22 grant. 23 Q. Does G-money mean gangster 24 money? 25 A. No, it means you are getting</p>

<p style="text-align: right;">Page 290</p> <p>1 WILSON 2 thousands of dollars. G doesn't mean 3 gangster. 4 Q. Okay. 5 A. And just to clarify because you 6 asked me the question this is African 7 American vernacular, and it is not to be 8 inferred with any criminal or subversive 9 intent. I just need point that out to 10 you. 11 Q. Okay. 12 MR. MARK KLEIN: I am going to 13 ask the reporter to mark as Exhibit 15 14 -- 15 A. I am kind of getting lost in all 16 these documents. Which ones are we 17 focusing on? 18 Q. At the moment you don't have to 19 worry about any of these. 20 A. What about this one? 21 Q. Put it here/? 22 A. This one? 23 Q. No. 24 MR. MARK KLEIN: I am going to 25 ask the reporter to mark as Wilson Exhibit</p>	<p style="text-align: right;">Page 292</p> <p>1 WILSON 2 of the marked copies? 3 MR. MARK KLEIN: We can talk 4 about that later. Yes. 5 A. All right. 6 Q. Just tell me when you have 7 reviewed Exhibit 15, sir. 8 A. Well, I note that there are 9 several pages of e-mails. So I am just 10 trying to read through all of them here. 11 (Pause.) 12 Q. I will direct you to particular 13 parts, but just tell me when you have 14 looked through this. 15 A. Okay. 16 (Pause.) 17 A. Yes, I -- let me get to the last 18 page. Hold on. 19 Q. Okay. 20 A. Yes, I see that now. 21 Q. Okay. Do you recall seeing 22 this exhibit during the arbitration at 23 which you were represented by Mr. 24 Zwiebach? 25 A. No.</p>
<p style="text-align: right;">Page 291</p> <p>1 WILSON 2 15 a document that was Bates stamped DEF 3 957 through 980. In the copying the Bates 4 stamped didn't show up. It is a document 5 that was marked as CUNY 91 at the 6 arbitration. 7 (Wilson Exhibit 15 marked for 8 identification.) 9 (Document handed to witness.) 10 Q. Dr. Wilson, I show you what has 11 been marked as Wilson Exhibit 15. Please 12 review this quickly and tell me whether 13 you have ever seen it before. 14 A. What was your question? 15 Q. Just review this and tell me 16 when you have done so. 17 (Pause.) 18 MR. JAMES KLEIN: Will I 19 receive a copy of all these exhibits or 20 are these my copies to take? 21 MR. MARK KLEIN: These are your 22 copies to take. 23 MR. JAMES KLEIN: And will I 24 have the marked copies, so I know what 25 exhibit numbers they are? Can I get copies</p>	<p style="text-align: right;">Page 293</p> <p>1 WILSON 2 Q. Let me direct your attention to 3 the bottom of the second page of Exhibit 4 15, an e-mail from Marjorie Lewis to you 5 on January 14, 2010? 6 A. Yes. 7 Q. And the e-mail says "Dear 8 Professor Wilson, we received your payment 9 request," and it gives a number for 10 \$309.84 on an account number which it 11 identifies, right? 12 A. Yes. 13 Q. And then she says we cannot 14 process this payment because PSC dash CUNY 15 awards do not support iPod, and you 16 purchased an iPod for \$179 from the Apple 17 store on December 19, 2009? 18 A. That's correct. 19 Q. And you made this request for 20 payment from the research foundation, 21 right? 22 A. That's correct. 23 Q. And Marjorie Lewis worked at the 24 research foundation? 25 A. Yes, she did.</p>

<p style="text-align: right;">Page 294</p> <p>1 WILSON 2 Q. Okay. Then you submitted -- I'm 3 sorry. That e-mail was on January 14, 4 correct? 5 A. Correct. 6 Q. Now, on January 17 -- 7 A. Where do you see January 17? 8 Q. On the first page of Exhibit 15. 9 A. Okay. 10 Q. It is an e-mail from you to 11 Annie London, right, toward the bottom of 12 the page? 13 A. Yes. 14 Q. And Annie London was your 15 assistant at the graduate center? 16 A. That's correct. 17 Q. And you copied yourself and Mr. 18 Anderson, correct? 19 A. That's correct. 20 Q. And your e-mail says "Annie no 21 wants a Macbook with all the bells and 22 whistles, and for his office I assume Noah 23 wants a laser color copier. We will also 24 need a Dell laptop for Amber, new staff 25 person. Funding is from BC Foundation -</p>	<p style="text-align: right;">Page 296</p> <p>1 WILSON 2 Q. Okay. 3 A. Who didn't have a computer. 4 Q. And you said you -- it also says 5 in this e-mail, "I may want the new Apple 6 iTouch." Right? 7 A. That's correct. 8 Q. And then it says "Order two 9 Kidels." Did you mean Kindels from 10 Amazon? 11 A. Probably Kindels. That's 12 correct. 13 Q. Who was that supposed to be for? 14 A. I don't recall at the time. 15 Maybe one for me and one for Annie. I am 16 not sure. 17 Q. And payment for all these things 18 were supposed to come out BC Foundation 19 Deutsche Bank grant account, right? 20 A. Apparently. Yes. 21 Q. And did you receive those or any 22 of them? 23 A. Me, no. Noah received the 24 Macbook I believe. I don't know actually 25 what he received, but -- so I didn't get</p>
<p style="text-align: right;">Page 295</p> <p>1 WILSON 2 Deutscher Bank grant," right? 3 A. Yes. 4 Q. BC Foundation Deutsche Bank 5 Grant was the grant for the United 6 Community Teachers Program? 7 A. Urban Community. 8 Q. Urban Community Teachers 9 Program. Thank you. Right? 10 A. Correct. 11 Q. And you were asking Ms. London 12 to purchase for you -- for Mr. Anderson a 13 Macbook with all the bells and whistles 14 and a printer? 15 A. Correct. 16 Q. A laser jet printer? 17 A. That's right. 18 Q. And a Dell laptop for Amber, a 19 new staff person, right? 20 A. Right. 21 Q. Who was Amber? 22 A. Amber was a staff person who was 23 assigned -- she was actually a doctoral 24 student working with our students in the 25 program.</p>	<p style="text-align: right;">Page 297</p> <p>1 WILSON 2 Amber's -- you asked me if I received 3 these. I didn't receive Amber's laptop. 4 Q. Did you get an Apple iTouch? 5 A. I am not sure. 6 Q. All right. But you -- 7 A. I am not even sure what an Apple 8 iTouch is to tell you the truth, so I am 9 not sure if I got an Apple iTouch. If it 10 is an iPad, I am not positive. I don't 11 know what an iTouch is, and that is what I 12 wrote. Maybe I meant IPad. I don't 13 know. 14 Q. In any event you instructed 15 Annie London your assistant to purchase 16 these things using funding from BC 17 Foundation Deutsche Bank Grant Fund? 18 A. Yes, I did. Yes. 19 MR. MARK KLEIN: Okay. It is 20 5:21. Why don't we break for the day. 21 What time do you want to start tomorrow, 22 9:30 or 10? 23 MR. JAMES KLEIN: Our 24 preference would be 10. 25 THE WITNESS: 10 would be fine.</p>

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2	MR. MARK KLEIN: Okay. Let's		2	E X H I B I T S	
3	start at 10.		3		
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7			7	Disclosures	14
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14	this day of , 2019		14	5 Plaintiff's Answers to	
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3			3		
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5			5	EXHIBIT DESCRIPTION	PAGE
6	I, DEBBIE ZAROMATIDIS, a Shorthand		6	12 DEF 00546 through 553	269
7	Reporter and a Notary Public, do hereby		7	13 DEF 143 through 171	278
8	certify that the foregoing witness, JOSEPH		8	14 DEF 00650 and 651	285
9	WILSON, PhD, was duly sworn on the date		9	15 DEF 957 through 980	291
10	indicated, and that the foregoing is a		10		
11	true and accurate transcription of my		11		
12	stenographic notes.		12		
13	I further certify that I am not		13		
14	employed by nor related to any party to		14		
15	this action.		15		
16			16		
17			17		
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19			19		
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22			22		
23	DEBBIE ZAROMATIDIS		23		
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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF SEPTEMBER 1, 2016. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

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